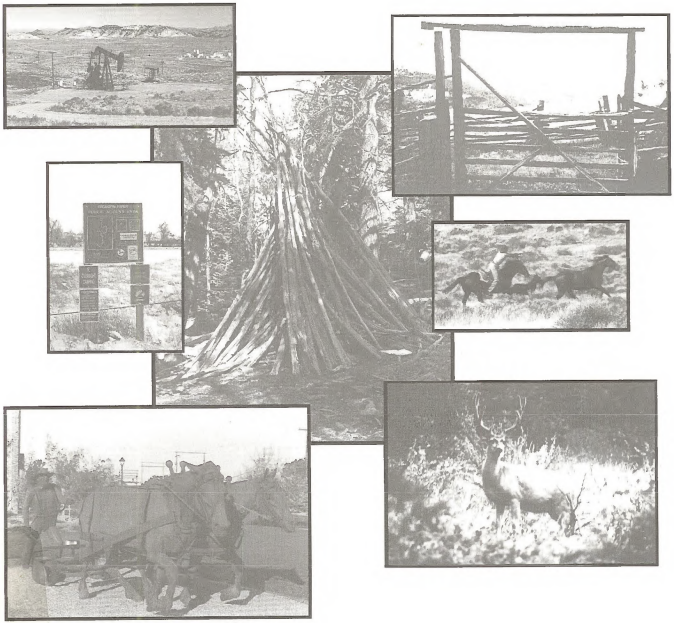
BLM LIBRARY
88048204

I.S. Department of the Interior
ureau of Land Management
Worland District Office

Bighorn Basin Resource Area June 1996

FINAL
Environmental Impact Statement
Grass Creek Planning Area
Resource Management Plan
Volume 2 of 2 (Comment Letters)



The Bureau of Land Management is responsible for the balanced management of the public lands and resources and their various values so that they are considered in a combination that will best serve the needs of the American people. Management is based upon the principles of multiple use and sustained yield: a combination of uses that take into account the long term needs of future generations for renewable and nonrenewable resources. These resources include recreation, range, timber, minerals, watershed, fish and wildlife, wilderness and natural, scenic, scientific and cultural values.

BLM LIBRARY
RS 150A BLDG. 50
DENVER FEDERAL CENTER
P.O. BOX 25047
DENVER, CO 80225

BLM/WY/PL-96/021+1610

ID88/8204

QH
76.5
.W8
W675
1996
V.2
c.2

FINAL
ENVIRONMENTAL IMPACT STATEMENT
and
PROPOSED
RESOURCE MANAGEMENT PLAN
for the
GRASS CREEK PLANNING AREA
in the
BIGHORN BASIN RESOURCE AREA
WORLAND DISTRICT
Worland, Wyoming

prepared by:

U.S. Department of the Interior
Bureau of Land Management
Worland District Office

June 1996

BLM LIBRARY
RS 150A BLDG. 50
DENVER FEDERAL CENTER
P.O. BOX 25047
DENVER, CO 80225

Wyoming State Director

June 18, 1996
Date

New Table 24
Index of Comments and Responses

Number	Topic
	1. GENERAL -- BLM's Legal Authority
1.1	Wyoming and U.S. Constitutions
1.2	Private Lands Along the Bighorn and Greybull Rivers
1.3	Private Lands and BLM Requirements In an Allotment
	2. GENERAL -- The Draft and Final EIS Documents
2.1	Information Provided by Commentors on the Draft EIS
2.2	Language, "May, Might, Possibly, Where Appropriate"
2.3	Glossary, References, and Index
2.4	Level of Detail, CRM, HRM, Updating the Plan
2.5	Document Format, Management Common, Alternatives and Assumptions
2.6	Plan Monitoring and Evaluation Requirements
	3. GENERAL -- Ecosystem Management
3.1	Ecosystem Conservation, Native Biological Diversity
3.2	Ecosystem Boundaries, Greater Yellowstone Ecosystem
3.3	Measuring Biological Diversity
3.4	Ecosystem Management Across Jurisdictional Boundaries
	4. GENERAL -- The National Environmental Policy Act
4.1	Custom and Culture
4.2	Public Hearing Request and Comment Period Extension
4.3	Involvement of Local People in Planning, Response to Scoping
4.4	Previous Grazing EIS Favored, Adopting Existing Management
4.5	Range of Alternatives
4.6	Impacts of BLM Decisions on Adjacent Private and State Lands
4.7	Response to Public Comments, Form Letters, Out-of-State Views
4.8	Cumulative Impacts, Other Kinds of Impacts and Relationships
4.9	No Action Alternative For Grazing, Estimates Mistaken For Decisions
4.10	No Action Alternative For Oil and Gas Leasing

New Table 24 Index of Comments and Responses	
Number	**Topic**
5. GENERAL -- Socioeconomics	
5.1	Supporting Local Economic Productivity
5.2	BLM Program Funding Related to Economic Benefits of Activities
5.3	Economic Projections in the Draft EIS, Rounded Numbers
5.4	Value of an AUM Compared to Recreation
5.5	Beneficial Impacts of Businesses
5.6	Adverse Economic Effects Related to Land Use Restrictions
6. GENERAL -- Wild and Scenic Rivers	
6.1	South Fork of Owl Creek
6.2	Wild and Scenic River Review Process
7. GENERAL -- Wilderness	
7.1	Opposition to Designating More Wilderness
7.2	Conservationists' Wilderness Alternative
8. AIR QUALITY MANAGEMENT	
8.1	Dust Control
9. CULTURAL, PALEONTOLOGICAL, AND NATURAL HISTORY RESOURCES	
9.1	Paleontology of the Willwood Formation, Interpretive Signs
9.2	The Need to Protect Sensitive Resources From Too Much Use
9.3	Sheepeater Cultural Site
9.4	New Agreement To Streamline Cultural Resource Process
9.5	Disturbance Near Petroglyphs
9.6	Hobby Collection of Fossils
10. FIRE MANAGEMENT	
10.1	Benefits of Fire
10.2	Use of Fire to Improve Sage Grouse Habitat
11. FORESTLAND MANAGEMENT	
11.1	Forestland Management Objectives
11.2	Anticipated Harvest Levels and Forestland Health

New Table 24 Index of Comments and Responses	
Number	**Topic**
11. FORESTLAND MANAGEMENT (Continued)	
11.3	Requirements For Wildlife Security Areas, Aspen Distribution
11.4	Importance of Old-Growth Forests
11.5	Firewood Cutting Along Rivers and Desert Drainages
12. LANDS AND REALTY MANAGEMENT -- Access	
12.1	Improving Public Access, Map 24, BLM's Transportation Plan
12.2	Condemnation
12.3	Access and Road Construction
13. LANDS AND REALTY MANAGEMENT -- Landownership Adjustments	
13.1	Lands For Agricultural Development
13.2	Lands For Suburban Expansion and Other Community Needs
13.3	Desert Land Entries
13.4	Land Exchange in the Wild Horse Area, Reduction of County Tax Base
13.5	Public Involvement
14. LANDS AND REALTY MANAGEMENT -- Rights-of-Way	
14.1	Impacts to Transportation Facilities
14.2	Underground Routing, Costs to Relocate Lines, Restrictions
14.3	Protection of Existing Rights, Corridors in Timbered Areas
14.1	List of Pending Rights-of-Way, Preexisting Projects, Altamont
14.5	Distribution Facilities
14.6	Construction Near Riparian Areas
14.7	Corridors and Concentration Areas
15. LIVESTOCK GRAZING MANAGEMENT	
15.1	Wetlands, Riparian Areas
15.2	Suitability, Adjustments/Reductions, Actual and Authorized Use
15.3	Goals to Address Overgrazing
15.4	Livestock AUM Gains Through Management
15.5	Responsibility For Fencing Costs

New Table 24
Index of Comments and Responses

Number	Topic
	15. LIVESTOCK GRAZING MANAGEMENT (Continued)
15.6	Current 1990 Grazing Levels, Enhancing Livestock Production
15.7	Use of 1990 as a Base Year, Drought and Nonuse
15.8	Allotment Categorization Process
15.9	Utilization, Key Areas
15.10	Utilization and Wildlife Population Objectives
15.11	Subjective Visual Management Approach
15.12	Bias Against Grazing, Compatibility with Other Objectives
15.13	Restrictions on Water Development to Benefit Elk
15.14	Fencing Around Water, Grazing on Bighorn River Public Lands
15.15	Range Management Concepts, Terminology
15.16	Chemical Spraying as a Vegetative Treatment
	16. MINERALS MANAGEMENT -- Oil and Gas
16.1	Making Areas Off-Limits to Development, 100% Open to Leasing
16.2	Justification For Restrictions, Resources to be Safeguarded
16.3	Controlled Surface Use and Sage Grouse
16.4	Controlled Surface Use and Big Game
16.5	Waiver of No Surface Occupancy Requirements, Environmental Review
16.6	Impact Analysis and Mineral Exploration and Development Costs
16.7	Benefits to Wildlife from Produced Water
16.8	Effect of Restrictions on Development
16.9	Standard Lease Terms and Conditions Favored Over Other Restrictions
16.10	Composition of the Planning Team, Geological Expertise
16.11	Natural Gas Development Underestimated
16.12	Lease Stipulations and Parameters For Their Use, Mitigation
16.13	Justification For Restrictions, Consideration of Less Restriction
16.14	Existing Lease Rights
16.15	The Costs and Benefits of Administering Mineral Development
16.16	Historical Evaluations in Oil Fields

New Table 24 Index of Comments and Responses	
Number	**Topic**
16. MINERALS MANAGEMENT -- Oil and Gas (Continued)	
16.17	Variations Among Alternatives Because of Restrictions
16.18	Visual Resource Management Policy on Split-Estate Lands
16.19	Mandate to Lease Entire Planning Area
16.20	Standard Lease Terms and Conditions Favored Around Existing Fields
16.21	Minerals Occurrence Potential and Use of Restrictions
17. MINERALS MANAGEMENT -- Locatable/Salable Minerals	
17.1	Mineral Resources and Impacts, Coal and Phosphate Classifications
17.2	Titanium and Zircon Deposits, Development Potential
17.3	Mineral Withdrawals Favored, Geologic Basis For Withdrawals
18. OFF-ROAD VEHICLE MANAGEMENT	
18.1	Restrictions, Effects on Public Access
18.2	The Need For Enforcement
18.3	Access and Vehicle Limitations in the Red Canyon Creek Area
19. RECREATION MANAGEMENT	
19.1	Recreation Facilities at Wardel and Harrington Reservoirs
19.2	Recreation Projections Too High For Red Canyon Creek
19.3	Recreation Projections Too High Overall
19.4	Surface-Disturbances For Recreation, Agricultural Practices
19.5	Projections on Decline of Primitive Recreation
20. VEGETATION MANAGEMENT	
20.1	Strategy on Transplanting Protected Plants
20.2	Scientific Names
20.3	Definition of Good Condition Range
20.4	Achieving Proper Functioning Riparian Areas, Checklist Method
20.5	Ecological Condition as a Value Judgement, Updated Information
20.6	Desired Plant Community Objectives, When to Use
20.7	Noxious Weeds, Use of Livestock to Control Weeds

New Table 24 Index of Comments and Responses	
Number	**Topic**
20. VEGETATION MANAGEMENT (Continued)	
20.8	Native Biological Diversity
20.9	Definition of Trend
21. VISUAL RESOURCE MANAGEMENT	
21.1	Highlighting Historic Oil Industry Features
21.2	Visual Resource Classes
22. WATERSHED MANAGEMENT	
22.1	Rebuilding Sediment Control Structures
22.2	Watersheds Considered in Ecosystem Management Plans
22.3	Soil Erosion Estimates
23. WILD HORSE MANAGEMENT	
23.1	Wild Horse Herd Area
23.2	Elimination of Herd Area, Federal-State-Private Jurisdiction
23.3	Wild Horse Management During Drought
24. WILDLIFE MANAGEMENT	
24.1	Predation on Wildlife Reduced by Good Habitat Management
24.2	Information, Clarifications, Corrections, Biological Assessment
24.3	Wildlife Sightings, Wildlife Maps Disputed, Habitat Protection
24.4	WGFD Wildlife Population Objectives
24.5	Fish and Wildlife Habitat and Rangelands Should Be Emphasized
24.6	Predator Control Measures
24.7	The Preferred Alternative Favors Wildlife
24.8	Aquatic Biology and Biologists
24.9	Ferrets, Wolves as an Experimental Population
24.10	Grizzly Bear Contingency Measures
24.11	Bighorn Sheep Recovery, Restrictions on Domestic Sheep Grazing
24.12	Habitat Fragmentation
24.13	Requirements For Management of Candidate Species

New Table 24 Index of Comments and Responses	
Number	**Topic**
25. SPECIAL MANAGEMENT AREAS General	
25.1	ACECs Considered to be Like Wilderness Areas
25.2	ACEC Designation Criteria
26. SPECIAL MANAGEMENT AREAS Badlands Proposed ACEC	
26.1	New ACEC Proposal Considered
27. SPECIAL MANAGEMENT AREAS Fifteenmile Creek Watershed Proposed ACEC	
27.1	Cooperative Enterprises For Watershed Improvement
27.2	Geologic Erosion, Grazing Management Incentives, CRM
27.3	Naturalness Affected by Construction of Sediment Control Structures
28. SPECIAL MANAGEMENT AREAS Meeteetse Draw Rock Art Proposed ACEC	
28.1	Supervision of Recreational Use
28.2	Bentonite Mining Claims in the Area

1

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263
(307) 763-2244

RECEIVED
95 JAN 20 AM 8:50
BLM WORLAND D.O.

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

95 OCT 18 AM 10:00

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Lisa F. Rea
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Lisa F. Rea Date: 01-19-95

2

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263
(307) 763-2244

RECEIVED
95 JAN 20 AM 8:51
BLM WORLAND D.O.

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: R. E. RIDDLE
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: R. E. Riddle Date: 1-19-95

3

RECEIVED
JAN 23 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WY. D.O.

DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, OMAHA DISTRICT
215 NORTH 17TH STREET
OMAHA, NEBRASKA 68102-4978

REPLY TO ATTENTION OF

January 17, 1995

Planning Division

Mr. Bob Ross, Team Leader
U.S. Bureau of Land Management
P.O. Box 119
Worland Wyoming 82401-0119

Dear Mr. Ross:

Thank you for the opportunity to review the Draft Environmental Impact Statement for the Grass Creek Resource Area Resource Management Plan in Big Horn, Hot Springs Park and Washakie Counties in northwestern Wyoming. We offer the following comments.

The Corps of Engineers' primary responsibility in reviewing environmental documents of other agencies is to ensure that Section 404 of the Clean Water Act is adequately addressed. Your document makes only brief mention of wetlands in conjunction with cattle grazing. It is not clear where these wetlands are located or what, if any, impact the proposed management plan will have on these wetlands. If the management plan proposes any work in wetlands or waters classified as waters of the United States, a Section 404 permit may be required. For a detailed review of the permit requirements, final project plans should be sent to:

Mr. Matthew Bilodeau
U.S. Army Corps of Engineers
Cheyenne Regulatory Office
504 West 17th Street, Suite 280
Cheyenne, Wyoming 82001-4348

If you have any questions, please contact Ms. Jeanette Conley of our staff at (402) 221-3133. Thank you for the opportunity to review this proposal.

Sincerely,

Robert S. Nebel

Robert S. Nebel
Chief, Environmental
Analysis Branch
Planning Division

4

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:
The U.S. Contituition states that the US Govt must buy Wy land if they with to control Every aspect of Wy. [Blacked out portion.] We do not with to sell.

Name: Frank Waite
Mailing address: xxxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxxxx

Signed: /s/ Frank Waite Date: 1-19-95

5

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:
Wyo. State lands should be under the control of Wyo people. Not the [environmental] extremists of Calif and the eastern states who you seem to represent in the entirety.

Name: Mr. & Mrs. C. Robert Walton
Mailing address: xxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxx

Signed: /s/ Carolyn S Walton Date: 1-20-95
/s/ CRWalton

6

OPEN HOUSE COMMENTS

ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR THE

BLM GRASS CREEK RESOURCE MANAGEMENT PLAN

Date: 23 January 1995 -- Thermopolis, WY
Name: Jim Staggs
Address: xxxxxxxxxxxxxxxxxxx
Phone: xxxxxxxxxxxxxxxxx

Comment:
We need to make sure there is public access to Public lands on the National Forest or B.L.M. Lands for Hunting & Fishing as well as for Stock Permitees.
Example Cottonwood Upper Owl Creek and
The Road Now be for the County Commission and all other areas of Lock out Need to be of major concern to your planning.
Oil & Gas Exploration should be expanded where possible
Environmental Concerns should take in to consideration Local Customs as well as the human factor i.e. what excess hard ships will be caused by your final decisions

7

OPEN HOUSE COMMENTS

ON THE

DRAFT ENVIRONMENTAL IMPACT STATEMENT

FOR THE

BLM GRASS CREEK RESOURCE MANAGEMENT PLAN

Date: 23 January 1995 -- Thermopolis, WY
Name: Bill Hill
Address: xxxxxxxxxxxxxxxxxxxx
Phone: xxxxxxxxxxxxxxxxxx

Comment:
Of critical concern is the management of the 15 mile drainage. This is one the most unique areas on earth, however erosion is incredible. We must do what we can to control erosion through grating, vehicle, & structural & vegetative means. Development of cooperative enterprises with the NRCS, BLM, private & state concerns must be intensified. I suggest that we work together to find economical & practical means to address the watershed concerns of 15 mile & it's tributaries. I think historical evidence exists that the drainage could be different (better) [page 2] than it is. I realize that the drainage will never be tamed, but at least we could do better than we are. The Big Horn Basin WY "RCFD Council hears continual concern about the erosive capability of 15 mile. We are currently working with some land managers in South Dakota that may provide some practical ways & means to address land management issues on 15 mile. We stand ready to work with other partners partners in the Grass Creek Resource area to address some of the issues.

8

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull WY 82426-0263 (307)765-2244

RECEIVED
JAN 24 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Wayne Barnett
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Wayne Barnett Date: 1-17-95

9

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263 (307) 765-2244

RECEIVED
JAN 24 1995
BUREAU OF LAND MANAGEMENT

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: [illegible]
Mailing address: [illegible]
City, State & ZIP: [illegible]

Signed: [signature] Robert C. Frank Date: 1/23/95

10

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:

I am totally against adding wilderness areas to the country. I used to run a few sheep on land surrounded by BLM. I think there were about three people in charge of BLM at the time. We got along fine. Now, a couple of years ago, while surveying on a canal right of way, a pickup load of BLMers came charging over the sage, and demanding to know what we were doing. Cut your organization down to half a dozen--you will do a better job!

Name:
Mailing address: xxxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxxx

Signed: /s/ Jonathan Davis Date: 1-23-95

11

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:

The BLM spends its time & Money planning but your management skills are totally Void.

Name:
Mailing address:
City, State & ZIP:

Signed: /s/ William F. Craft Date: Jan 23/95

12

RECEIVED
JAN 26 1995
BUREAU OF LAND MANAGEMENT

U.S. Department of Transportation
Federal Highway Administration

Wyoming Division
815 Evans Avenue
Cheyenne, WY 82001-3754

January 23, 1995

Draft EIS, Grass Creek Resource Area Resource Management Plan

FILE: 410

Mr. Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

We have reviewed the above referenced Draft EIS and ask that you more adequately discuss impacts to transportation facilities including State highways within the area. This would include any potential increases in traffic volumes, maintenance of existing facilities, changes in philosophy concerning highway easements, etc.

If we can be of any further assistance, please call Rod Vaughn at 772-2012, ext. 48.

Sincerely yours,

[signature]
RODNEY D. VAUGHN, P.E.
For FREDERICK A. BEHRENS, P.E.
Division Administrator

13

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-0263

[Same as Letter #1]

...

Additional comments:
No More restrictions on Wyo public lands.
Let We Citizens of Wyo, Manage this Affairs,

Name: Charley D Helling
Mailing address: xxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxxx

Signed: /s/ Charley D Helling Date: 1/24/95

14

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263 (307) 765-2244

RECEIVED
JAN 26 1995
BUREAU OF LAND MANAGEMENT

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: GARY J. ANDERS
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Gary J. Anders Date: 1-24-95

15

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263 (307) 765-2244

RECEIVED
JAN 26 1995
BUREAU OF LAND MANAGEMENT

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Karen Anders
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Karen Anders Date: Jan. 17, 95

16

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Greybull, WY 82426-0263 (307) 765-2244

RECEIVED
JAN 26 1995
BUREAU OF LAND MANAGEMENT

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Bob & Fox Anne Brewer
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Bob Anne Brewer Date: 1-24-95
Kenneth R. Brewer

17

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Grybull, WY 82426-0263 (307)765-2944

RECEIVED
JAN 27 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong in our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: R J McIntosh
Mailing address: [redacted]
City, State & ZIP:
Signed: R J McIntosh Date: 1/23/95

18

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Grybull, WY 82426-0263

[Same as Letter #1]

...

Additional comments:
Wyoming & its citizens would be just as well off, if this Thing you are doing to the Grass Creek area was Left Undone.

Name: Edgar F. Harwood
Mailing address: xxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxx

Signed: /s/ Ed Harwood Date: Jan 25-1995

19

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Grybull, WY 82426-0263 (307)765-2944

RECEIVED
JAN 27 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong in our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Theresa Harwood
Mailing address: [redacted]
City, State & ZIP:
Signed: Theresa Harwood Date: 1-25-95

20

GRASS
Grass Roots Alliance For State Sovereignty
Box 263, Grybull, WY 82426-0263 (307)765-2944

RECEIVED
JAN 27 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong in our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Stan Kennedy
Mailing address: [redacted]
City, State & ZIP:
Signed: Stan Kennedy Date: 1/19/95

21

United States Department of the Interior

BUREAU OF MINES
Physical Science Laboratory Center
P.O. Box 25086
Building 20, Denver Federal Center
Denver, Colorado 80225

RECEIVED
JAN 27 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

January 24, 1995

Memorandum

To: Bob Ross, Team Leader, Bureau of Land Management, P.O. Box 119, Worland, WY 82401-0119

From: Supervisory Physical Scientist

Subject: Review of Draft Resource Management Plan and Environmental Impact Statement for the Grass Creek Resource Area, Worland District, Big Horn, Hot Springs, Park, and Washakie Counties, Wyoming

As requested by Robert Bennett, Acting State Director, Bureau of Land Management, personnel of the U.S. Bureau of Mines reviewed the subject document to determine whether mineral resources or mineral-production facilities would be adversely impacted by the proposed project. The document addresses four alternatives for managing the public lands and resources in the Grass Creek Resource Area of northwestern Wyoming.

The document is very well written and, for the most part, mineral resources and mineral-related issues have been covered in detail. However, we have several comments concerning text discussions and specific minerals. All mineral resources occurring in the Grass Creek Resource Area should be identified in the Affected Environment section, Chapter 3. Phosphates, zeolites, geothermal, and coalbed methane resources occur in the Resource Area and are discussed elsewhere in the text (p. 192, table 15, appendices 2 and 4, map C, etc.), yet are not included in the Minerals section of Chapter 3. Available maps and literature indicate that brick clay, common clay, and uranium resources also occur in the Resource Area, yet these commodities are not listed or discussed in the document. Any impacts, or lack thereof, to all production facilities (for example the bentonite mills in Lucerne and Worland) should be identified and mitigation measures discussed.

If you have questions concerning this review, please contact Joanne Zeiler at (303) 236-0428, ext. 299.

Mark H. Hilpenbaum

Mark H. Hilpenbaum

22

RECEIVED
JAN 30 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

[redacted]

January 26, 1995

Mr. Bob Ross
Team Leader - RMP draft EIS
BLM - Grass Creek Resource Area
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

Thank you for sending the draft EIS on the Grass Creek Resource Area Resource Management Plan. I appreciate the opportunity to comment. My comments are directed toward cultural resources. I strongly support most of the management objectives and actions for the rock art sites, particularly at Legend Rock and Medicine Draw, outlined for the preferred alternative. I strongly support expanded use of these areas for scientific and educational purposes, and designation of the Medicine Draw area as an ACEC is an excellent protective measure.

However, I am not without concern, particularly with the proposal to develop interpretive trails in the Medicine Draw rock art area. I am all for public education and interpretation. However, this also has a major adverse effect. Without proper staffing and supervision, major degradation and vandalism of these sites can occur. The Medicine Draw area is isolated; access is difficult, and the rock art sites are spread out. If the public were directed to these sites, there is no doubt that serious vandalism would occur. I can only wonder, with current staffing levels, whether BLM has the resources to adequately patrol and supervise the area.

The Castle Gardens Rock Art site is no better example of the degradation that can occur without proper site supervision. This site is open to the public with directional signs, trails and chain link fencing around some panels. The fencing has served as little protection. It has been out, broken and bent so that people can crawl inside enclosures. Holes have been cut into the fencing for picture taking. Human traffic in front of the fence has caused so much erosion that concrete footings on fence posts are now exposed and artifacts are washing out from deposits at the base of panels. Areas that have not been fenced are covered with graffiti and bullet holes. Entire panels or figures have been chiseled out of the rock. Castle Gardens is one of the saddest things I have ever seen. And there is every possibility that increased public access to Medicine Draw could result in the same type of degradation.

Perhaps the best option and balance for the Grass Creek Resource Area is to restrict additional public development to the Legend Rock site. This site has already been proposed for development as a state park, but funds for proper supervision have been lacking. The state wisely chose not to open the site, unless a full-time supervisor could be arranged. No rock art site should ever be opened to the public unless a full-time supervisor can be present. There are also many advantages of enhanced development at Legend Rock. The site is already

22.2

very well known and frequently visited. A cooperative arrangement with the state of Wyoming could be negotiated to lead tours and supervise the site. Like Castle Gardens, this site has already suffered some pretty severe vandalism, and further degradation could be prevented. Information from the Medicine Draw area could be incorporated into interpretive exhibits and educational materials distributed at Legend Rock.

In between Legend Rock, Medicine Lodge Creek and Castle Gardens, areas in and around the Grass Creek Resource area afford plenty of opportunities for public visitation and education regarding values of Native American rock art, without opening up the rock art in Medicine Draw, which has undergone much less vandalism. Public use of the Medicine Draw area is minimal now, and it should be kept that way in the best long-term interest of the resource.

Thank you again for the opportunity to comment.

Sincerely,

Julie Francis, Ph.D.
Archeologist

23

GRASS
Grass Roots Alliance Inc. State Sponsored
Box 263, Cowgill, MT 82626-0263 (307)765-2244

RECEIVED
JAN 30 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resources Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . If you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

David A. Fitner

Name: [redacted]
Mailing address:
City, State & ZIP:

Signed: David Fitner Date: 1-27-95

The Nature Conservancy
Wyoming Natural Diversity Database
1604 Grand Ave., Suite 2 • Laramie, Wyoming 82070 • (307) 745-6228

24

RECEIVED
95 FEB -3 AM 8
BLM WORLAND

RECEIVED
FEB 1 1995

1 February 1995

Walter Fertig,
WNDD Botanist

Bob Ross
Team Leader
PO Box 119
Grass Creek Resource Area
Worland, WY 82401-0119

Dear Mr. Ross,

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Grass Creek Resource Area Resource Management Plan. I am a botanist employed by the Nature Conservancy and can offer the following comments on the Special Status Vegetation section (pp 134-138) of the plan:

1. Two species are listed as occurring in the Planning Area which, based on the legal descriptions given, are actually found in the Cody Resource Area of the Worland District. These species are Arnnatic pussytoes (Antennaria aromatica) and Wyoming tansyaster (Dendraseris SOCKLOSKIANA). Neither was found in the Grass Creek Resource Area during floristic surveys of the Grass Creek Mountains (the only likely area of habitat) in 1991-92 (see Jones and Fertig 1992 and Fertig 1992 reports). Both should be listed as "known to occur outside the planning area, but potential to occur in the planning area".

2. Rocky Mountain twinpod (Physaria saximontana var. saximontana), a US Fish and Wildlife Service category 2C species, is omitted from Table 11. Six populations of this Wyoming endemic taxon are known from the foothills of the Owl Creek Mountains. Within the planning area (see Fertig 1992 report). This species was added to the USFWS candidate list in the 30 September 1993 Notice of Review.

3. The federal status of two species in Table 11 is incorrect. Persistent sepal yellowcress (Rorippa obtusa) is listed as a 2C candidate in the 1993 Notice of Review. William's waterparsnip (Cryptotaenia williamsii) was recommended for listing as a 2C, but

Recycled Paper

24.2

was not included at that rank in the 1993 Notice. Recent status surveys have shown it to be more abundant than once suspected and it is currently listed as a 3C species.

4. Other recommended status changes: The Notice of Review is currently being revised by USFWS and is expected to be published in late 1995. Contracted ricegrass (Oryzopsis contracta) and yellow springbeauty (Claytonia ionochanda var. flava) have been recommended for downlisting from category 2C to 3C. Confirmation with USFWS is needed to make sure that these proposed changes will actually be accepted.

5. Although unfamiliar to most users of the Plan, it would be helpful to include scientific names with the common names for plant species listed in Table 11. This would avoid undo confusion resulting from the use of a non-standard common name, as in the case of "Moll's aster" (Aster mollis). (There is no person named "Moll", the mollis in the name means "soft" and refers to the hairs on the plant's leaves).

One final comment on the preferred alternative for management of candidate T & E plants (page 53):

6. The strategy of transplanting protected plants onto BLM lands should be reassessed. Transplanting rare species, especially those adapted to dry, rocky, barren sites or specific soil types, is difficult, and in the case of the species listed in Table 11, has never been attempted. In my experience, rare plant species usually have little difficulty establishing themselves on suitable sites and may already be occupying most or all areas of suitable habitat available to them. Transplanting seems like an unnecessary and costly strategy with a low probability of success.

A preferable strategy would be to assess potential land management conflicts on a species-by-species basis and work with permitees and other interested parties in resolving conflicts at specific sites. In most cases, these rare plant species occur on barren, rocky slopes with no water and little forage (and thus are not likely to be adversely affected by most range uses). Mineral development activities could be allowed provided that plant habitat is not disturbed by roads or pipelines and well pads are located off-site. This strategy is more in keeping with the intent of the directives in BLM Manual 6840 requiring the agency to "manage USFWS candidates in such a manner that these species and their habitats are conserved and to ensure that agency actions do not contribute to the need to list these species as "threatened or Endangered".

24.3

Thank you again for soliciting comments on the draft.

Sincerely,

Walter Fertig
Heritage Botanist

References:

Fertig, W. 1992. Sensitive plant species surveys and revised species checklist, Grass Creek Resource Area, BLM. Unpublished report prepared for the BLM Grass Creek Resource Area. 100 pp.

Jones, R. and W. Fertig. 1992. Checklist of the vascular plant flora of the Grass Creek Resource Area, north-central Wyoming. Unpublished report prepared for the BLM Grass Creek Resource Area. 20 pp.

US Fish and Wildlife Service. 1993. Plant taxa for federal listing as Endangered or Threatened species; Notice of Review. Federal Register 58: 51144-51190.

cc: Jeff Carroll, BLM state botanist
Marian Atkins, Grass Creek RA

25

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:

I don't think that I could have said it better myself. Pause, Mr Ross, don't take this as personal, because it's not. The BLM along with countless other federal agencies have forgotten that "we the people" pay their salaries--they work--you work--for us.

Name: David Bayert
Mailing address: xxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxx

Signed: /s/ David O. Bayert Date: 2-8-95

[redacted]

RECEIVED
FEB - 9 1995
BUREAU OF LAND MANAGEMENT
SALEM, ORE.

26

February 5, 1995

Mr. Bob Foos:

I'm writing this response to the E.I.S. on the Grass Creek Resource Area.

I have several comments to make in regard to the enlargement to the Wild Horse Range; i.e. the additional allotment of the Tatman Mt. area.

I: It was my understanding when the existing area of 89,100 acres was allotted, that the reason Tatman Mt. was not included in that area was because of the damage being done in the area by the wild horses, and that horses were to be excluded from the Tatman area. Now it seems that you are saying you can't build fences that will keep the horses out of Tatman, so you want to give up and let the horses back into an area that 10 years ago your biologist said they were destroying. What happens next? 10 years from now you're going to say that you can't hold the horses in the expanded range and you need to give them another 20,000 acres? Under that type of management, why even have a range for them? Just let them roam free as they were in the beginning.

I do not see in the E.I.S. where you have addressed the effect of the additional 20,000+ acres on the wildlife in this area (deer, antelope and various bands), or the effect on the springs and water holes.

If you do insist on enlarging the area to more than 80,000+ acres of the existing range, instead of fixing the fence, then I think that you should take the

26.2

20,000+ acreage that you want to add (Tatman Mt.), and delete this same acreage from the original allotment. Your man who manages the horses, claims that they don't use the South end of the range anyway. This would hold the allotment to the original acreage of 80,000+ acres.

If B.L.M. is not able, with fences, to hold the horses in an allotted area, then why go through the false problems of even having an allotted acreage for the horses? Instead of enlarging their range, fix the existing problems of fences and waterholes and abide by the concerns of previous horse managers and biologists, and keep the horses in their original allotment.

II: In regard to reservoirs in the Five, Ten, and Fifteen mile area, I believe we are getting the short end of the stick in this area. The existing water holes were mostly made back in the 1500's and 1600's. At this time, they were deemed to be necessary for the survival of wildlife and livestock. Now, 40 years later, they are in mad shape and most if not all, need repair.

If they were viable 40 years ago, why aren't they now? Your conclusions are that the reservoirs and check dams are all silted in. If they are all silted in, that says to me that the previous managers knew what they were doing when these check dams were built. They have stopped the siltation flow until they were filled, and now need to be rebuilt. They must have worked, or they wouldn't be silted in.

All of the best grazing in the world is of no use, if water is not available.

In the Elk Creek area, erosion is a real problem. After every rain, Elk Creek is a wall of mud going to the Big Horn River, increasing siltation problems in the

26.3

river, and decreasing the fishing potential. The check dams in this area are all silted in, proving that they worked when originally installed. B.L.M.'s attitude seems to me to be if something works, don't fix it when it has done what it was designed for. Check dam's were installed to stop siltation and when they were filled to overflowing with silt, they were abandoned instead of being built back up to prevent more siltation, and now they are just big gullies and washes.

When these check dams were abandoned, the water went to the reservoirs which were then filled with silt and finally had the dams breached.

In the Five mile area a new water hole was fenced off with a pipe running to a waterer in the gulch below. This has never worked, and water runs out until it's below the outlet pipe. This has been reported, but B.L.M.'s response has been not to fix the problem, but to allow the livestock permitted to open the fences enclosure to his cattle, thereby destroying the vegetation around the water hole, and trumping down the pond edges. Again, don't fix something that has the potential to a work, just go on to bigger and better plans.

If this type of operation goes on in this area, which I'm familiar with, then I'm sure it goes on all over the entire resource area. It's little wonder that your Department receives little or no support from the people of your district.

III: In regards to the road usage by vehicles in the E.I.S. I object to the use of the term "designated" roads and feel the use of "existing" roads should replace it. I was told at the Greybull meeting, when I asked who would determine which roads would be designated as roads that

26.4

could be used by vehicles, I was told that this would be done by B.L.M. personnel and not by the Public. To me this stinks, as B.L.M. could cut out public travel to the whole area if they so desired.

The problem of access to B.L.M. lands is already one that should be a top priority to all B.L.M. management. Road closures by B.L.M. officials supported in the E.I.S. sounds to me like just one more way that B.L.M. is trying to shut the public out of access to public lands.

In my opinion, B.L.M. is taking away the publics rights to use these lands, a small piece at a time. If you don't get your way this year, you know that if you keep nibbling away, you will get what you want in the end. Both of these E.I.S. take away a little more of our rights. B.L.M. asks for comments from the public on how to manage these lands and if they (the comments) don't "fit" with the policy B.L.M. is trying to push through, the comments are circumvented in one way or another until the public is so fed up with the way B.L.M. operates, that they will no longer attend a comment meeting or offer any more suggestions on how B.L.M. should operate.

IV: Wardell Reservoir - I am strongly against any Day Use facilities or camping sites being established at either Wardell or Harrington Reservoirs. Wardell is now too over run with speed boats pulling water skiers, that it's almost impossible to fish! Four boats on a reservoir of this size means that one of these is passing you every two minutes. This body of water is already so heavily used by water skiers and jet skiers, that problems are occuring between sure and fisherman. To deliberately increase usage is asking for trouble. I personally have

26.5

been fishermen (me included), forced off the water by the speed boats coming so close that the wake of the boat threatens to capsize small fishing craft. Debris left by the parties held by these people are an eyesore and a hazard. Alcohol plays a big part in the problems and having camp sites would, in my opinion, only enlarge this problem, as no enforcement of boating laws are currently being carried out. Game & Fish, the Sheriff's Department, and B.L.M. have all been told of this problem, yet no one does anything about it. B.L.M.'s answer was to abandon the fishing on Wardell and use Harrington for fishing, and leave Wardell to the speed boats. The only problem is, there aren't any fish in Harrington Reservoir!

V) Finally, in conclusion, let me quote some of your monetary figures from pages 204 - 213 in the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement Information book, under grazing and recreation:

Alt A	139,421,203	117,500,305
Alt B	140,710,482	124,605,250
Alt C	122,580,378	130,131,915

These are the dollar amounts that those two factors would put into the Local Economy. From these figures under Alt A Recreation, this would provide 84% of what grazing does. Under Alt B, 88%, and under Alt C, 106%. In your budget for the years 1990 - 2005, does recreation realize these same percentages in expenditure that grazing does? In other words, for each dollar spent to enhance

26.6

grazing is 84 cents to $1.06 spent on Recreation enhancement? If not, why not?

Thank you for taking the time to read my comments and observations. I will be looking forward to reviewing the final draft of this E.I.S.

Earl J Kelsey

Earl J Kelsey

[redacted]

27

Feb 17, 1995

Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wy. 82401

TO Bob Ross,

After having reviewed the Draft EIS for the Grass Creek Resource Area, I have came to the conclusion that the BLM is not going to administer the commercial forest within their jurisdiction based upon the principles of multiple use and sustained yields.

Using the BLM's timber stand Rotation of 160 years the 14,000 acre commercial forest will produce 1,312,500 board feet of timber annually. The present BLM EIS calls for a harvest of 400,000 board feet annually. In addition to the 14,000 acres of Commercial forest there is 45,000. acres of WoodLand managed for other uses. The EIS also states that 1300 acres have been distrubed by Logging or fire in the past 100 years. Also what kind of management will the BLM have done, that by 2005 85% of the commercial forest will be Mature or overmature, Leading to infestations of bugs, root disease, and mistletoe. At which Time Forest structural diversity, and associated wildlife habitat and biological diversity would decline. Also increasing the risk of a catastrophe fire leading to the possible loss of public and private resources.

[page 2]

Also the socioeconomics of the area would increase if commercial forest Land was managed as such. It is my belief that the BLM is just planning to sell enough Timber so that Steve Christy, District Forester can justify his job. If the remainer of this EIS is wrote in this manner then the BLM is not managing public Lands to the interest of the public but to the intrests of the Federal Government and the bureaucatic system it has made.

So at this time I ask that you (BLM) revise the final EIS to manage commercial forested Land as commercial forest land.

Sincerely,
/s/ William K. Wilson
William K. Wilson
Monument Wood Products
TenSleep, Wy 82442
(307) 366-2630

P.S. I also am forwarding my comments to the Local and STATE Elected officals and to the South Big Horn Basin Multiple Use Association.

RECEIVED
FEB 22 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

28

February 21, 1995

Bob Ross, Team Leader
Grass Creek Resource Management Plan
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Sir:

This is a letter to comment on the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (EIS), September, 1994.

I believe that the definition of Ecosystem Management on page 8 of the EIS should be clearly defined as Ecosystem Conservation in order to properly evaluate how the proposed alternatives would meet the goal of maintaining ecosystem integrity. A generally accepted definition of Ecosystem Conservation is that of protecting the integrity of natural ecological systems with a complete complement of native biological diversity and perpetuating natural disturbance regimes on a regional scale over a time-frame of millennia. Certainly Ecosystem Management cannot happen without Ecosystem Conservation. Acceptance of this definition will more sharply focus on the inadequate nature of the proposed alternatives in this proposed document.

None of the proposed alternatives are acceptable. Acceptance of the above definition of Ecosystem Conservation does not mean no commodity production can take place, but it does mean that business-as-usual on the public lands is over. It does mean that management for a complete complement of native biological diversity becomes of paramount concern and that commodity use can take place only to the extent that it does not negatively affect this complete complement of native biological diversity. Obviously, this includes the viable presence of the large carnivores.

28.2

Certainly it will mean less commodity uses over all such as less livestock grazing (none in some cases such as riparian areas), less timber harvest, less oil and gas activity, no more roading, etc., but it does not necessarily mean none of these activities. It will mean elimination of feral horses since we already have a National Feral Horse Range in the nearby Pryor Mountains of Montana. The extent of commodity uses must remain questions for the professional wildlands ecological scientist to answer as he or she evaluates any of these proposed uses, including recreational impacts, with the ecological integrity of the Greater Yellowstone Ecosystem of which the Grass Creek Resource Area is part.

I suggest that the Bureau of Land Management rework this document to include Alternative E - Ecosystem Conservation, as defined in this letter.

I appreciate this opportunity to comment.

Sincerely,

Chuck Neal

Chuck Neal

[redacted]

29

Wyoming Resource Providers Coalition

February 21, 1995

Darrell Barnes
District Manger
Bureau of Land Management
PO Box 119
Worland, WY 82407-0119

FEB 23 1995
BUREAU OF LAND MANAGEMENT

Dear Mr. Barnes:

The Wyoming Resource Providers Coalition (WRPC), on behalf of the multiple-use groups and the citizens of the Worland BLM District, is requesting a public hearing on the Grass Creek Resource Area Resource Management Plan (GCRMP). A public hearing would show BLM interest and concern for the Grass Creek area and give the people affected by the Draft Environmental Impact Statement (DEIS) the chance to publicly comment.

The WRPC and other groups and individuals have been working on the GCRMP DEIS to prepare comments, but this document will impact such a large number of people that just providing written comments is not enough. The Worland BLM office has held open houses, for which we are all thankful, but the benefits of open houses in the past seem to have had little effect on the outcome of previous documents.

The GCRMP proposes to severely increase restrictions on oil & gas without providing any justifications for doing so and does not give credence to successful operations in sensitive areas. There is no allowance for solving problems dealing with sensitive areas through mitigation or other cooperative processes. The agriculture industry is going to experience a 35 percent reduction in useable allotments, and once again there is no justification. This unnecessary reduction will cause severe hardship on the livestock industry in the Grass Creek area and throughout Wyoming. With the increase in restrictions and reduced access for commodity development, where are the citizens of the Grass Creek area going to turn to continue making a living?

The economics in the DEIS do not really give the true socioeconomic impacts to the various communities. The DEIS does not fully consider the customs and culture that have evolved over the years. The people of the Grass Creek area depend on the public lands to survive, and these lands are a very important part of the customs and culture of this area. Public comment via open houses and written response is not enough. Because this document will affect so many, the need and necessity of a public hearing is readily apparent. To change or impact the current philosophy of the BLM, the public needs to be in a public arena, where they can present their case and the BLM can present its.

The WRPC and its members are extremely concerned about the outcome of the GCRMP, therefore, we are requesting a public hearing to be held in Thermopolis, Wyoming during the middle of March. Thermopolis should be the hearing site since this

P.O. Box 761 - Laramie, Wyoming 82070 - (307) 743-0996

29.2

community will be severely affected by the current and/or any future outcomes of GCRMP. Due to time restrictions, the WRPC would appreciate a response to this request by the first of the month. I look forward to hearing from you.

Sincerely,

Dallas Steets Valdez

Dallas Steets Valdez
State Coordinator

cc: State Director, Alan Pierson
Governor Jim Geringer
Senator Craig Thomas
Senator Alan Simpson
Representative Barbara Cubin
Big Horn Co. Commissioner Chairman, Don Russell
Hot Springs Co. Commissioner Chairman, Jean Owsley
Park Co. Commissioner Chairman, John Wieninger
Washakie Co. Commissioner Chairman, Bill Glanz

30

Wyoming State Legislature
313 State Capitol / Cheyenne, Wyoming 82002 / telephone 307-777-7881

MAR - 2 1995
BUREAU OF LAND MANAGEMENT

Office of Representative
REPRESENTATIVE (R) 9th DISTRICT
Box 1064 (R) Big Horn County
PO Box 506
Lovell, Wyoming 82431
COMMITTEES:
AGRICULTURE, PUBLIC LANDS AND WATER RESOURCES (Chairman)

February 27, 1995

Darrell Barnes, District Manager
Bureau of Land Management
P. O. Box 119
Worland, WY 82407-0119

Dear Mr. Barnes:

I am writing as Chairman of the Joint Agriculture, Public Lands & Water Committee to request a public hearing on the Grass Creek Resource Area Management Plan.

The public comment hearing will give people involved and concerned about the proposed plan to be better informed by your agency, and express their concerns. The opportunity for this involvement will help the communities be more a part of the process.

I appreciate your consideration of this request.

Sincerely,

Sylvia B. Gates

Sylvia B. Gates
State Representative

SG

xc: Dallas Valdez

Dedicated to the wise use of Wyoming's Section 3 grazing lands.

WYOMING STATE GRAZING BOARD

CHEYENNE, WYOMING
Box 1200 Lander, Wyoming 82520
(307) 332-2683

MAR - 2 1995
BUREAU OF LAND MANAGEMENT

31

2/22/95

Mr. Darrell Earnes, DM
Worland BLM
PO# 119
Worland, Wyo.82407

Dear Mr. Earnes,

I am writing you in my capacity as Chairman of the Worland State Grazing Board. Our nine man Board is Chartered by Wyoming Statute 9-4-201, to represent the interest of the BLM permittees who hold Section 3 grazing permits in your district.

We have reviewed the Draft Grass Creek RMP/EIS, and while we appreciate the efforts of your range staff to provide some additional management flexibility on some subjects over the old Grass Creek Plan, we find the Draft Plan to be unacceptable in certain portions of the new Draft document. In particular, I would like to express dismay over the information displayed in Appendix 3, Table 3-5, COMPARISON OF STOCKING LEVELS, ACTUAL USE, AND SUITABILITY BY ALLOTMENT. Although the Draft does not explain the source of the data base on suitability in this table, we understand from your employee Jim Cadney that the data in this table did not come from recent studies, but in fact came from the BLM's Grass Creek Plan developed in the early 1980's.

We have been advised by recognized expert sources from both outside the Bureau and from within, that the suitability data from the old Grass Creek Plan was determined by the Bureau itself to be unreliable and that as a result of that internal determination by the Bureau, that the criteria used to develop this estimate of suitability was removed from BLM's Technical Handbooks as an approved method on this subject.

Those of us in the farm/ranching business are range managers by definition. We understand the concepts of suitability as it is intended by the Science of Range Management, and we and our BLM range conservationist consider these concepts during the development of our allotment plans. The on the ground management of our allotments reflects these and other principals of vegetation and livestock management.

31.2

But the information in Table 3-5 is at best, an unreliable estimate with respect to the suitability of the allotments in the Table, and at worse, are wrong. Neither the public nor the ranchers are well served by information in this Table because it portrays a situation that is not supported by a procedure that represents the state of the art on this subject.

On behalf of our permittees, I am asking you to remove this Table, and all references in the Draft to this Table, from the Final Grass Creek RMP. Please also provide a narrative in the Final RMP that fully explains to the public the technical reasons why this Table is being removed from the RMP. I am also asking you to provide written assurance to me that no Bureau employee will consider or use in any way, the information from this Table in the development of new allotment plans, or in the revision of existing plans. The Worland State Grazing Board will continue to convey to our permittees the importance of considering the current state of the art concepts of suitability in the development of allotment grazing plans. We would like your assurances that your employees will do likewise.

On another matter, I would like to offer the support of the Worland State Grazing Board to the request you recently received to hold a public Hearing on this Draft Plan. A public Hearing would provide an appropriate forum for permittees and others to convey to the Bureau a level of detail not usually conveyed in written comments on a document of this type. It would also allow the public, local politicians, and the Bureau an opportunity to themselves hear the concerns of their neighbors.

Thank you for considering these concerns. Please contact me at your earliest convenience with your response to the items in this letter. Please also send a copy of your response to Dick Loper at the Lander address shown above.

Sincerely,

Frank Rhodes

Frank Rhodes, Chairman
Hamilton Dome, Wyo. 82427

RECEIVED
MAR 6 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

32

March 3, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY. 82401

Dear Mr. Ross,

I have read your draft Grass Creek Resource Management Plan and want to express my support for alternative C.

I am pleased to see that under all alternatives except B you propose to close roads in forested areas after they have served their intended purpose, i.e. forest products harvests. The main objection I have to building new roads is that politically and practically they are often difficult to close and thus remain open to vehicular access, resulting in a net loss for wildlife. Please hold your ground on this one.

I hope you will continue to address non-point soil erosion problems as you have proposed in the plan. Watersheds contained within the Resource Area, particularly the Fifteenmile, provide a considerable amount of sediment to the Bighorn River. This sediment is contributing to decreased fish habitat and water quality within the lower Bighorn River and upper Bighorn Lake.

Although I cannot specifically locate it in your plan, I have heard some comments expressed in the newspaper by an individual alluding to the effects of predators on sage grouse. I hope you are not duped into more predator control on public lands. Excessive predation to wildlife can usually be traced to lack of quality habitat. Keep the habitat intact through proper land management practices and wildlife populations will respond favorably.

I want to complement you on a thorough and well thought out plan. Although I favor alternative C, I would endorse your preferred alternative as a strong second choice.

Sincerely,

James T. Peters

FAX: 03-06-1995 [illegible] FAX NO. 13076487820 P.02

RECEIVED
MAR 6 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

33

United States Department of the Interior
NATIONAL PARK SERVICE
BIGHORN CANYON NATIONAL RECREATION AREA
20 SUNRAY LAS EAST
LOVELL, WYOMING 82431

IN REPLY REFER TO:

A3615

March 3, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY. 82401

Dear Mr. Ross,

The following comments represent a consolidated response from the National Park Service.

National Natural Landmarks (potential) are adequately addressed and we support the preferred alternative.

We wish to bring to your attention that there may be areas that were assisted in part through the Land and Water Conservation Fund (LAWCF) grants program that may be impacted by the Grass Creek Resource Area Management Plan. We recommend that you contact the State Liaison Officer who is responsible for the administration of the LAWCF in reporting to determine if the areas are subject to provisions of section 6(f) of the LAWCF Act, as amended. The State Liaison Officer is Jim Sedewick, Wyoming State Parks and Department of Commerce, Barrett Building, Third Floor North, 2301 Central Avenue, Cheyenne, Wyoming 82002. Mr. Sedewick or John Sedewick, Grants Officer (same address), at (307) 777-6326 will be able to assist or inform you of the proper procedure for compliance under the LAWCF Act, if necessary.

We are generally pleased with the steps you have proposed to reduce erosion and the amount of waterborne sediment which ultimately ends up in Bighorn Lake. We thank you for the opportunity to comment on your draft Grass Creek Area Resource Management Plan. It is a comprehensive document which should serve as a useful guide in managing the natural and cultural resources under your care. We support your preferred alternative.

Sincerely,

Darrell J. Cook

Darrell J. Cook
Superintendent, Bighorn Canyon National Recreation Area

34

BOARD OF COUNTY COMMISSIONERS
Judy J. Kissinger, Chairman
Charles W. Johnston, Vice Chairman
Jill Stockley Sedda, Commissioner
Harry Gaskill, Commissioner
Jay R. Moody, Commissioner

RECEIVED
MAR 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Park County, Wyoming
Incorporated 1911

Commissioners' Office

Courthouse, Park County Courthouse
1002 Sheridan Avenue
Cody, Wyoming 82414

March 7, 1995

Darrell Barnes, District Manager
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

RE: **Grass Creek Resource Area Management Plan DEIS**

Dear Mr. Barnes:

The Park County Commissioners, on behalf of the citizens of Park County, request that a public hearing be held concerning the Grass Creek Resource Area Management Plan DEIS prior to April 7, 1995. We believe that public hearings can provide critical input and identify issues, concerns, and information that might not otherwise be provided through small group discussions, individual meetings, open houses, and written testimony. Public hearings with the limitations that might be inherent to the hearing process, allow individuals an opportunity to consider information, concerns and comments provided by other members of the public, and encourage discussion and the resolution of problems.

Thank you for your consideration in this matter. We believe that through the public hearing process we can resolve differences and implement a plan for the Grass Creek Area that is supported by the citizens of Park County and results in the best possible management of our public lands.

Sincerely,
BOARD OF COUNTY COMMISSIONERS
PARK COUNTY, WYOMING

Judy J. Kissinger, Chairman

Charles W. Johnston, Commissioner

Jill Stockley Sedda, Commissioner

Jay R. Moody, Commissioner

1002 Sheridan Avenue Cody, Wyoming 82414 (307) 587-2204, Ext. 200

35

WASHAKIE COUNTY COMMISSIONERS

Courthouse
P.O. Box 260
WORLAND, WYOMING 82401

WILLIAM BLAND, Chairman
ALVIS LASS, Member
WILF JOHNSTON, Member
HAROLD COX, Member
STEVE TOBELSKY, Member

Phone (307) 347-8400
Fax Phone (307) 347-8566

RECEIVED
95 MAR -9 AM 9:38
BLM WORLAND D.O.

March 7, 1995

Bureau of Land Management
Joseph T. Vessels, Acting
Grass Creek Area Manager
P. O. Box 119
Worland, WY 82401

Re: Grass Creek Management Plan

Dear Joe:

The Washakie Commissioners [illegible] numerous calls from our constituents [illegible] Grass Creek Management Plan. We are requesting [illegible] Bureau of Land Management [illegible] "Comment Period" be extended [illegible] receive a copy of the Economic Impact Statement [illegible] need time [illegible].

We will look [illegible]

Sincerely,

Board of Washakie County Commissioners

William Bland, Chairman

Alvis Lass, Member

Wilf Johnston, Member

Harold Cox, Member

Steve Tobelsky, Member

WCC/jw

CHIEF WASHAKIE

36

3/9/95

ROBERTS HOME CARE

[(xxx) xxx-xxxx] xxxxxxxxxxxxxxxx
[xxxxx(xxx)xxx-xxxx] xxxxxxxxxxxxxxxxxxxx

Attn Bob Ross,

I request that BLM protect Red Canyon, Bighorn River and The Badlands from oil Development. Also the Badlands should be designated ACEC because of its beautiful views.

Protect All Areas included in Conservationists Alternative including lands outside the WildErness Study.

Do You have kids? Do You want them to be able to enjoy Wilderness Areas? I do and I want my kids to enjoy theses areas also. lets protect them!

Sincerely
Mary Roberts

37

Gerald J Kresge
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

Bob Ross, Team Leader
Bureau of Land Management
Box 119
Worland, Wy. 82401

3/8/95

Dear Mr. Ross:

I was deeply distressed, as a 37 year resident of the State of Wyoming to read of the draft management plan for the Grass Creek ReSource Area which allows for 100% of the area to be leased for oil and gas development, and without adequate protect (in terms of management) for the 3 areas designated ACEC.

I have, as a former Summer employee of the U.S.F.S., always defended and promoted the noncept of multiple use of public resources, but your plan (that permits almost uncontrolled oil and gas development) fails short of that concept.

Specific changes in your proposed plan that would protect and promote the larger public interests should include:

one - Protection from oil development in the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek --SRMA areas

two - Badlands (SRMA) should be designated ACEC (iconic area--and fragile soils).

three - Greater protection(management) should be included in your plan in areas outside of your proposed plan that presently constitute significant use and value to recreationists, education potential (archeological sites, etc.) and scientific research (geological, etc).

I have, as a retired Educator in Wyoming Public Schools, always defended the role of management and protection of public lands by the BLM and other Government Agencies. I sincerely hope this support and faith has not, over the years, been misguided.

Thank you for the opportunity to expressi my concern and input over this critical issue.

Sincerely Yours,
/s/ Gerald J. Kresge

Gerald J. Kresge
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

xxxxxxxxxxx

RECEIVED
MAR 13 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

38

March 9, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

We are concerned with the new plans allowing the possibility of gas and oil development in the Grass Creek Resource Area of Wyoming. We believe the Badlands Special Recreation Management Area should be designated as ACEC (Area of Critical Environmental Concern) also, and we are worried that even this ACEC designation does not have sufficient 'teeth' to truly protect these special areas.

We urge that the Badlands, the Bighorn River area, the Red Canyon Creek area, and the Absaroka Foothills area all be protected from oil, gas, or other mining development. Our hopes that our need-and-greed for oil does not destroy the all eternity items special segments of our environment.

We urge that the Conservationists' Alternative to the BLM plan be heeded, including for lands outside the Wilderness Study areas; and that these areas be taken into account in long range plans for any oil, gas, or mineral development, other land use, or continued overuse by grazing.

Thank you for hearing our views.

Sincerely,

Dr. & Mrs. Larry M. Allen and family
[redacted]

RECEIVED
MAR 13 1995

39

Dear Mr. Ross:

10 March 1995

These are comments for the Bureau of Land Management's Grass Creek Resource Area. Changes to the plan should include:

1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Management Areas (SRMA) should be protected from oil development.

2) The Badlands SRMA should also be designated an Area of Critical Environmental Concern (ACEC) because of its spectacular scenic beauty and fragile soil.

3) Protect all areas included in the Conservationist' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Thank-you for your attention to this important matter.

Sincerely,

John C. Sargent

RECEIVED
MAR 13 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

40

March 10, 1995

Bob Ross
Bureau of Land Management
PO Box 119
Worland Wyoming 82401

Mr. Ross:

I am writing to you concerning the Bureau's management plan for Grass Creek Resource Area. I am very concerned about the plan and strongly disagree with its contents. Put in general terms, the fact that it allows for 100% of the area to be leased for oil and gas development poses a serious danger to the environment, and therefore to ourselves. Specifically, I would ask that you *seriously* consider making the following changes in *your* management plan:

- The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.
- The Badlands Recreation Management Area should also be designated as an Area of Critical Environmental Concern because of its unique, natural beauty and very fragile soil.
- All areas included in the Conservationists' Alternative to the Bureau's Wilderness Proposal should be protected, including lands outside Wilderness Study Areas.
- Define goals to deal with overgrazing problems in the resource and plan for those goals to be met in the next five years.

Thank you for considering my thoughts. I hope that you will keep in mind that our environment is not an endless resource, and that its depletion and destruction has a powerful effect on us. In the short run it may seem easier to rip up the earth to gain oil, gas, timber, etc., but in the long run we'll suffer from ruining the land we must live on and with.

Sincerely,

Ann K. Yanek
[redacted]

41

March 10, 1995

Bob Ross, Team Leader
Bureau of Land Mgt
P.O. Box 119
Worland, Wyo 82401

Mr. Ross

We are writing to ask for the following changes in the BLM Bighorn Basin Plan--Grass Creek Resource area.

We would like the following changes made in the management Plan:

1. The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas should be protected from oil development.
2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic & extremely fragile soils.
3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal - including lands outside Wilderness Study areas.
4. Finally provide more definite goals to address the problems of overgrazing in the resource area & provide a timeline to accomplish those goals in the next five years.

(over)

Please respond to let us know what action you are taking.

/s/ Mrs. M. Temple
/s/ (Mr.) C Temple
/s/ Mrs. S.M. Temple
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

When oil companies develop an oil field--they put up signs that say "Keep Out" Poison gas area. This means that is no longer public land because no one can use the land including the wildlife.

42

Sydney Walter
xxxxxxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxxx

3-11-95

Dear Mr Ross--

The Grass Creek Resource Area deserves comprehensive protection. I hope you will protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside the WSA's. Especially, the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek SRMA's should be protected from oil development. The Badlands SRMA should be designated ACEC. Definite goals to address overgrazing in the resource area should be developed & implemented.

/s/ S. Walter

43

RECEIVED
MAR 14 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

3/13/95

[redacted]

Bob Ross, Team Leader
BLM
P.O. Box 119
Worland, Wyo. 82401

Mr. Ross:

I am writing concerning the BLM's draft management plan for the Grass Creek Resource Area of the Bighorn Basin. In my opinion there are many serious problems with this plan, especially since this is the land of all of the people to be protected far into the future for all of the people, not to be a money-maker for the few.

I believe the BLM should withdraw the Absaroka Foothills, Badlands Red Canyon Creek, and Bighorn River Special Recreation Management areas as well as the proposed Montezuma Crew, Upper Owl Creek and Fifteenmile ACEC's from all oil and gas leasing due to the sensitive nature of these areas and the inadequacy of the proposed stipulations.

The BLM should protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas.

The BLM should provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years. The BLM should also improve range condition to encourage ecosystem health and biodiversity.

And last, the BLM should definitely limit off-road OHV use to EXISTING ROADS AND TRAILS as proposed, but prohibit their use from roadless areas, ACEC's and WSA's. And the enforcement of motorized use restrictions should be increased to prevent further degradation of highly erodible soils.

Thank you for seriously considering these vital issues!

McLane Downing

44

March 10, 1995

Bureau of Land Management
P.O. Box 119
Worland, Wyoming

Mr. Bob Ross, Team Leader

Re: The BLM's Bighorn Basin Plan

1. I think the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek special Recreation Areas should be protected from oil development.
2. The Badlands SRMA should be designated an ACEC because of it's fragile soils and spectacular views.
3. In the Conservationists' Alternative to the BLM's Wilderness Proposal, protect all areas outside the Wilderness Study Area

Thank you very much

/s/ Greg Schiller
xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx

45

RECEIVED
MAR 14 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

March 11, 1995
McLane Downing
[redacted]

Bob Ross, Team Leader
Bureau of Land Management
P O BOX 119
Worland, Wyoming 82401

Subject: Bighorn Basin Draft Management Plan

Dear Mr Ross:

I would like the following changes in the draft plan:

Protect the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas from oil and gas development.

Designate the Badlands Special Recreation Management Area as an Area of Critical Environmental Concern.

Utilize the Conservationists' Alternative to the BLM Wilderness Proposal.

Include goals and a timetable for addressing overgrazing in the resource area.

Very truly yours

McLane Downing

46

Robert R. Schneider, P.E. (Ca. C-8481) March 9, 1995
Civil Engineer

1211 Calle Lanio
Sierra Pa, New Mexico 87501
(505) 985-1013

RECEIVED
MAR 14 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

Bob Ross, Team Leader
Bureau of Land Management
PO Box 119
Worland, Wyoming

Dear Mr. Ross:

BLM's Bighorn Basin Plan, calling for massive oil and gas developments, if implemented would permit virtually uncontrolled oil and gas development in this most beautiful part of your state. The following changes need to be made:

1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be permanently protected from oil development;
2) The Badlands (SRMA) should also be designated an ACEC because of its specular scenic and extremely fragile soils;
3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas;
4) Provide more definite goals to address the problems of overgrazing in the resource area and provide a timeline to accomplish those goals in the next five years.

Sincerely yours,

Robert R. Schneider

Robert R. Schneider, PE

47

12 Mar 95

Mr. Ross,

I am writing to you in regards to the draft management plan for the Grass Creek Resource Area.

I believe the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek, Special Recreation Management Areas (SRMA) should be protected from oil development. In addition the Badlands SRMA should be designated an ACEC because of its uncommon scenery and its extremely fragile soil.

Protection of all the area included in the Conservationists Alternative to the BLM's Wilderness proposal including lands outside the Wilderness Study area.

Finally, more definitive goals need to be made to address the problems of overgrazing in the resource area and provide a timeline to accomplish those goals in the next five years.

Sincerely,

/s/ Timothy E. Cowley
xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

48

RECEIVED
MAR 15 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

March 14, 1995

Bob Ross
Team Leader
Box 119
Worland, WY 82401

Dear Bob,

I am writing this letter to comment on the Draft Management Plan for Grass Creek. I must say that I was very disappointed that no alternative was developed that didn't include leasing all the resource area for oil and gas development. In fact I can't see much difference between the preferred alternative and the others.

It seems to me that a Conservation Alternative could be developed that includes these points:

Off-road vehicles need to be limited to existing roads and trails and specifically excluded from roadless areas, ACECs and WSAs. You certainly will find support among livestock interests fort such a condition.

Improve range conditions by incorporating time limitations on use. There are serious problems out there with erosion.

Withdraw several areas from all oil and gas leasing. Some areas are just too sensitive especially in light of the inadequate protection offered by the proposed stipulations. These areas include the ACECs of Mesteetsee Draw, Upper Owl Creek and Pitzenmile Creek. Also, Badlands Red Canyon Creek, Absaroka Foothills and the Bighorn River Special Recreation Management Area should be withdrawn.

Thanks for your consideration of these points.

Sincerely,

/s/ Mike Patrick
[redacted]

49

Phillip M Floyd family
xxxxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxx

Please make the following Changes in your draft management plan for the Grass Creek Resource Area.

1. Having been to these following areas numerous times they should be protected from oil development. Absaroka foothills, Badlands Bighorn River & Red Canyon Creek (SRMA).
2. Badlands SRMA should be designated ACEC for both scenic & geologic reasons
3. Support and protect all areas in Conservationists Alternative to BLM Wilderness Proposal-outside of WSA

Thankyou, /s/ Philip M Floyd family

50

2-13-95

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross,

Regarding your draft management plan for the Grass Creek Resource Area I would like to make the following comments:

1. The Absaroka Foothills Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas should all be protected from oil development. The Badlands area is especially fragile because of its thin (and sometimes on a crust) soils.

2. Please provide goals and a timetable to meet them regarding overgrazing within the resource area.

3. Protect all areas included in the Conservationist's Alternative to the BLM's Wilderness proposal including lands outside Wilderness Study Areas.

Sincerely,
/s/ Gary Simpson
Gary Simpson
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

51

Norma Cole
Rt 86 Unit 17 Bx 8
Monticello, KY 42633

Mr Bob Ross, Team Leader
Bureau of Land Managment
POBox 119
Worland, Wyoming 82401

Dear Mr. Ross

I just finished reading Elinor Pruitt Stewarts letter in which she details the beauty of the Bighorn Basin as a settler in the early 1900's. Much of the pristine beauty she describs must surely be lost, but that doesn't man we should destroy what's left. I oppose 100%, laizze faire system of development of oil & gas reserves - surely a less destructive method could be developed. I feel that it is the duty of Land Managment to manage not destroy -

Sincerely
/s/ Norma Cole

52

John Spezia
xxxxxxxxxxxxx
xxxxxxxxxxxxxx
xxxxxxxx

March 14, 1995

Bob Ross,

I am writing in regards to the BLM Bighorn Plan that is allowing a 100% leasing of all the area to gas & oil.

I have spent a fair amount of time in this area to know how fragile and important it is to the wildlife & local communities.

1- Your Grass Creek plan to lease all the area for oil & gas seems unreasonable.
2- You should protect the SRMAs of the Badlands, the Absaroka Foothills, Red Canyon and the Bighorn River itself.
3- There should be no oil development in each of the above areas and the Badlands themself should be designated an ACEC to protect its special qualities & fragilities.
4- Consider wilderness are periphery impacts
5- Develop a better AMP for grazing without damaging the resources & riparian areas.

Sincerely,
/s/ John Spezia

53

RECEIVED
MAR 16 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

MARTIN L. MICHEL

March 13 ,1995

Bureau of Land Management
P.O. Box 119
Worland , Wyoming. 82401

Gentlemen:

We are writing to ask that you act to protect the Grass Creek Resource Area from encroachment by Oil and Gas development.

This Beautiful area of Wyoming must be preserved for future generatins to enjoy.

Respectfully,
Martin L. Michel
Dorothy Michel
Susanne Y. Michel

THE STATE OF WYOMING

JIM GERINGER
GOVERNOR

RECEIVED
MAR 16 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

54

Department of Environmental Quality

Herschler Building • 122 West 25th Street • Cheyenne, Wyoming 82002

ADMINISTRATION	ABANDONED MINES	AIR QUALITY	INDUSTRIAL SITING	LAND QUALITY	SOLID & HAZARDOUS WASTE	WATER QUALITY
(307) 777-7758	(307) 777-7756	(307) 777-7391	(307) 777-7369	(307) 777-6145	(307) 777-7752	(307) 777-7781
FAX 777-7682	FAX 638-0799	FAX 777-7682	FAX 777-6937	FAX 638-0799	FAX 777-6937	FAX 777-5973

March 14, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

RE: **Grass Creek Resource Area, Resource Management Plan Draft RIS**

Dear Mr Ross:

Phil Ogle of the Water Quality Division (WQD) reviewed the above referenced Environmental Impact Statement (EIS) and provided comments which are presented in the following paragraphs. Thank you for the opportunity to comment.

The WQD agrees that it would be best to select a management plan alternative that will reduce the amount of erosion and sedimentation below estimated 1990 levels.

Ecosystems and Ecosystem Management, page 8: watersheds should be considered in ecosystem management plans for the Resource Area to factor in water quality and riparian area management. All of the watersheds within the Grass Creek Resource Area drain to the Big Horn River an important water resource in the Big Horn Basin and regionally.

Development of Mitigation Needs, page 4 and Table 3 pages 78-83: no specific mitigation measures or mitigation measures are listed for use when surface disturbance activities are allowed. Some indication that measures will be put in place to control erosion and sedimentation during surface disturbance and that areas will be revegetated following the disturbance should be given in the document.

Table 10 DEQ AND CLASSIFICATION OF STREAMS IN THE PLANNING AREA, page 125: the DEQ classification, for several streams in the table, is incorrect. The correct classifications according to Chapter 1 of the Wyoming Water Quality Rules and Regulations are as follows:

Fivemile Creek	3
Peasmile Creek	3
Fifteenmile Creek	3
Sixteenmile Creek	3
(Above and Below Wyoming 120)	
Coal Draw	3
Sand Draw	3

54.2

Mr. Ross
March 14, 1995
Page 2

Fifteenmile Watershed Proposed ACEC, page 181: WQD agrees with the proposal to make the Fifteenmile Creek Watershed an Area of Critical Environmental Concern (ACEC). The 1994 Wyoming Water Quality Assessment indicates that Fifteenmile Creek is fully supporting its designated uses including cold water fish, aquatic and wildlife watering. The stream is being impacted by sediment/silt, salinity, total dissolved solids, pesticides, and nutrients. The DEQ stream classification for Fifteenmile Creek and tributaries is presented below for your information.

Fifteenmile Creek	3
N Fk Fifteenmile Creek	4
S Fk Fifteenmile Creek	3
M Fk Fifteenmile Creek	4
Crooked Creek	4
Dry Cottonwood Creek	3
Rock Waterhole Creek	4
Wilson Spring Creek	4

Sincerely,

Dennis Hemmer
Director
Department of Environmental Quality

DH/PHO/jr/Ellis:lcr
cc: Mary Adams
File 55/95-261a

55

March 13 '95
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dr. Mr. Ross:

I am writing regarding the recently released draft management plans for the Grass Creek Resource Area.

This plan, as proposed, has a laizze faire system of management which allows for 100% of the resource area to be leased for oil and gas development.

Although the plan designated 3 area of critical environmental concern the management in these area is not strict and carefully enforced in order to protect the area.

I would like to request these changes in the management plan:

(1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special 2)
Recreation Management Areas should and must be protected from oil development.

(2) The Badlands SRMA should be designated as an Area of Critical Environmental Concern. The spectacular scenery & fragile soils of this area make it a candidate for ACEC.

(3) Protect all areas included in the Conservationists' Alternative to the Bureau of Land Management's Wilderness Proposal, including lands outside Wilderness Study Areas.

(4 Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

Please give this your conscientious attention.

We realize there are conflicting solutions pulling at you. But we know you care. We are counting on you. This is a critical time.

Sincerely,
/s/ Dorothy Coxey
Teacher, Mother, One who Cares

56

3-13-95

Dear Mr. Ross,

We are concerned about the BLM plans for the Grass Creek Resource Area in Wyoming We do not believe in opening this are for almost unlimited oil and gas development. The BLM is entrusted with preserving this land for future generations, not in benefiting corporate profits!

We strongly support protection of all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Sincerely Yours,
/s/ Robert E. Hess

Robert Hess
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxxx

RECEIVED
MAR 1 6 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

57

Betsy A. Leonard
[redacted]

March 13, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I have spent some time in Wyoming and know that the Grass Creek Resource Area is located in one of the most beautiful parts of the state. With the eastern slopes of the Absaroka Mountains, some of the most extensive and impressive badlands in Wyoming, and some magnificent rock art, Grass Creek should be considered a jewel of the Bighorn Basin. The diversity of Wyoming's habitat—from arid deserts to lush mountain forests—can be viewed from this unique resource area.

It is most disturbing that the current management plan is proposing a laize faire system of management which allows for 100% of the resource area to be leased for oil and gas development. Please consider making the following changes to the management plan to better protect this resource:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

As the Team Leader for a prominent government agency, it is your responsibility to protect the resource for succeeding generations. Should the current plan be adopted, irreparable damage to our environment may occur. Please use your authority wisely.

Sincerely,

Betsy A. Leonard

Betsy A. Leonard
Environmental Education Specialist

RECEIVED
MAR 1 6 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

58

March 13, 1995

Bob Ross
Bureau Of Land Management
Box 119
Worland, Wyoming 82401

Mr. Ross,

I am writing to you concerning the management plan for Grass Creek and the proposed laize faire system of management which allows for 100% of the resource area to be leased for oil and gas development. In fact, not of the alternatives consider leasing less than 100% of the resource area for oil and gas development.

Although the plan designates three Areas of Critical Environmental Concern (ACEC), the management in these areas is not sufficiently stringent to better protect the area.

I suggest the following changes:

1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next years.

If you have any questions or comments I may be reached at the following:

David Worthington
[redacted]

Sincerely,

David Worthington

David Worthington

59

Andrew Jones
xxxxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxx

Dear Mr. Ross:

I urge you to limit oil development in the Bighorn Basin & support the Conservationists' Alternative to wilderness designation.

Sincerely
/s/ Andrew Jones

60

March 15, 1995

Dear Friends,

Your plans for the Grass Creek Resource Area will mean uncontrolled oil and gas development in all that most scenic part of the Bighorn Basin. And I protest!

I view the whole scenic area as an area of Critical Environmental Concern. Certainly I am concerned. Is there no end your your ever-increasing encroachments on the national lands?

All the SRMA need to be protected from your oil developments, including those lands outside the Wilderness Study areas. Then there is the continuing problem of overgrazing in the resource areas that you allow. I would like to know when you plan to halt overgrazing.

Please address my concerns for Wyoming and what is left of its forests and plains and badlands and deserts. I care. Sincerely,

/s/ Norman Johnson

61

PAUL SZECSEY
xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Please--

- Protect the Absaroka Foothills, Badlands Bighorn River and Red Canyon From Oil Develop.
- Badlands SRMA should also be designated ACEC
- Protect all areas included in the Conservationist's Alternative to the BLM Wilderness Proposal including lands outside wilderness study areas.
- Provide more definite goals to address the problems of overgrazing in the Resource Area, and provide a time line to accomplish those goals in the next five years.

Thank you for your consideration.

/s/ Paul Szecsey

March 15, 1995

62

RECEIVED
MAR 17 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

[redacted] 14 March 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

We are writing you regarding your recently released draft management plan for the Grass Creek Resource Area of the Bighorn Basin. If implemented, this plan will permit virtually uncontrolled oil and gas development in one of the most beautiful parts of Wyoming. This beauty belongs to all Americans and such areas are disappearing. Your plan only adds another area.

We ask that you make changes in your management plan to help preserve the Grass Creek Area. We propose that the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) be protected from oil development. The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its scenic value and extremely fragile soils. We want you to protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Lastly, we would propose that you provide more definite goals to address the problems of overgrazing in the resource area and provide a timeline to accomplish these goals in the next five years.

We hope we can count on your cooperation to address the above issues and help preserve instead of developing America's scenic heritage.

Sincerely,

Thomas L. Branch

Pamela A. Branch

63

RECEIVED
MAR 17 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

March 14, 1995

Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, WY 82401

Dear Mr. Ross,

I have some comments on the draft management plan for the Grass Creek Resource Area in the Bighorn Basin. I am afraid that if it is implemented it will allow uncontrolled oil and gas development which will result in irreparable harm to nature.

Mankind seems bent on conquering every niche on the face of the planet. However, thousands of people are now realizing that such uncontrolled development is a mistake, and are willing to fight for wilderness. Wilderness on a big scale is essential for large ecosystems to exist. The Yellowstone ecosystem should connect out in every direction with other large ecosystems, like a giant spider. In a sense, Yellowstone is the heart of all the ecosystems of the West. It should connect to the west to Central Idaho. To the East it should connect to the Bighorn River and the Badlands. To the north it should connect to the Bob Marshall Wilderness and the Glacier National Park.

For this reason, I encourage you to make the following changes in the management plan:

PROTECT the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) from oil development.

DESIGNATE the Badlands SRMA as an ACEC due to its ecological fragility.

PROTECT all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside the Wilderness study areas.

GREATER YELLOWSTONE ECOSYSTEM

Sincerely,

Carl Davis

PS. Grazing in the resource area needs to be significantly reduced or eliminated, and a timeline provided to accomplish it in the next five years.

64

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am disappointed to see the BLM has not been sensitive to conservation in the Bighorn Basin plan. Conservation is not dead in the 90's. Many of us still want to see the beauty and diversity of our land and wildlife protected from the endless exploitation by economic interests.

The leasing of the area (100%!!) for oil and gas development is unacceptable. The Absaroka Foothills, Badlands, bighorn River and Red Canyon Creek Rec Mgmt Areas should be protected from oil development.

In addition we are requesting the Badlands should receive a higher level of protection due to it's beauty and sensitivity of environment.

We are further asking you to protect all areas included in the Conservationists Alternative to the BLM plan including lands outside the Wilderness Study Areas and to address issues of overgrazing in the sensitive areas.

Please include conservation in your agenda & your plans.

Sincerely
Rodd & Allison McAlpine

65

March 13, 1995

Bob Ross, Team Leader.
BLM.
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I grow up in Montana and am familiar with the Bighorns & Absaroka Range. I think your management plan is faulty. The Absaroka Foothills, Badlands, Bighorn River, and the Red. Canyon Cr. SRMA should be protected from all oil development. The Badlands SRMA should be an ACEC. Listen to the Conservationists' Alternative & protect all lands on their list.

Furthermore, overgrazing should be stopped by heavy fines or suspension of grazing privileges. Some areas should not be grazed at all. A timeline should be established to eliminate all grazing abuses within 5 years.

Sincerely,
/s/ Joseph L. DelTyer
xxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxx

66

Robert Turner, E51592
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxx
March 12, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross & other members of the management plan team,

I am writing to ask that you reconsider your draft for management of the Grass Creek Resource Area in the Bighorn Basin. The plan as currently written will allow for uncontrolled oil and gas development in every part of the resource area. I hope that you will revise the plan to set aside some of the area as protected from oil & gas exploration and drilling. I do not feel it is necessary to pen up the entire region for resource exploration. If a few areas are reserved for their wild and scenic values, the oil & gas that may be there will still be there in the future when less invasive techniques of prospecting and extraction may be invented. But if these areas are opened up to drilling with attendant additional road building, the recreational and biological preserve potentials will be compromised forever.

This is a very beautiful part of Wyoming. I have only been there once, and while I am currently unable to travel, I intend to return to the Bighorn Basin in the next decade as part of an extensive photographic scenic survey of the West. I hope that the areas that are highlighted in the resulting book will see an increase in recreational use. We have many protected mountain and forest locales, but protection of arid lowland and foothills, most of it BLM land, has been given short shift. The BLM needs to acknowledge, in every part of the West, that these arid and semi-arid regional have scenic, recreational, and biological preserve potential that needs to be given a value as important as, if not more so than, the mineral resources that may be there.

As for cattle grazing, I am not against that use, so long as the number of cattle are kept limited to prevent overgrazing and excessive competition with native fauna, and that measures are taken to protect riparian corridors. Any area with fragile soil should get special protection from commercial grazing. I hope that the management plan, when it is instituted, will have specific goals in it addressing the problem of overgrazing in the resource area, with a timeline to accomplish these goals in the next five years.

I ask that the team give careful attention to the Conservationists' Alternative to the BLM's Wilderness Proposal, protecting some additional lands outside the Wilderness Study Areas. The Special Recreational Management Areas should be protected from oil development, and the Badlands SRMA should be designated an Area of Critical Environmental Concern because of its scenic and extremely fragile soils.

Thank you for your attention to my views on this matter.

Yours truly, /s/ Robert Turner

67

RECEIVED
MAR 17 1995
BUREAU OF LAND MANAGEMENT
DALLAS, OREGON

Dale Brubec

March 14, 1995

Dear Bob Ross,

I'm writing this letter in response to the Bureau of Land Management's proposing management of the Grass Creek Resource Area in Wyoming. This area has a lot of interesting landscapes like mountain forests all the way to arid deserts. I'm concern about the possibility of 100% gas and oil development in this area. I would like to see the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Area (SRMA) be protected from oil and gas development. The Badlands SRMA should also be designated an Area of Critical Environmental Concern (ACEC) because the area has spectacular scenic and extremely fragile soils. Another important area to protect is all the areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas. I see one other problem and that is the overgrazing of the Grass Creek Resource Area. Maybe you could provide more definite goals to address the problems of overgrazing and provide a timeline to accomplish these goals in the next five years. The Grass Creek Resource Area is a special place and I think it is worth protecting. Thank you for your time.

Sincerely,
Dale Brubec

68

Sir. I ask that you protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Please also provide definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next 5 years. Please write us you plans.
Sincerely /s/ Kim & Donald Fontenot

69

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

re: Grass Creek Resource Area

March 15, 1995

Dear Mr. Ross,

I feel the draft management plan for the Grass Creek Resource Area is flawed. Oil and gas development interests are well served with the proposed 100% of the area leasing plan. Conservation interests have been ignored. I recommend the following changes in the management plan:

#1. Protect the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) from oil development.

#2. Designate the Badlands SRMA as an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils.

#3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

#4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Sincerely,

Page M. Spahr

Page M. Spahr

70

Dear Leader Ross

I urge you to take the following changes in your management plan;
1 The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.
2 Badlands SRMA - should be designated an ACEC because of its scenic & fragile soils.
3 Please protect all areas in Conservationists' Alternative to BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4 Provide definite goals to address problems of overgrazing in resource area & timeline to do this in the next five years.

Thank you - Sincerely /s/ R E Denmark

71

XXXXXXX
XXXXXXX
XXXXXXX

Bob Ross
B.L.M.
Worland
Wyoming

Dear Mr. Ross,

I am writing to comment on BLM's Bighorn Basin Plan.
I ask for the following changes.
1 The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek SRMA should be protected from oil development.
2 The Badlands SRMA should be designated an ACEC.
3 Protect all areas in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Thankyou

s/ Susan E. Cox

72

Sue Nash
XXXXXXXXXXXXXX
XXXXXXXXXXXXXX
XXXXXX

[Figurative Letterhead with inscription:
" *"WHEN WE TRY TO PICK OUT SOMETHING BY ITSELF, WE FIND IT HITCHED TO EVERYTHING ELSE IN THE UNIVERSE."- John Muir*"

Bob Ross, Team Leader
BLM
P.O.Box 119
Worland Wyoming
82401

Re: Draft Management Plan for the Grass Creek Resource Area.

I am appalled that the management plan allows leasing 100% of the resource area for oil and gas development--and further that the management of the three ACEC's is not sufficiently stringent to protect these areas.

I am asking that the following changes be made to the management plan:
(1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) must be protected from oil development.
(2) The Badlands SRMA must also be designated an ACEC because of its spectacular scenic value and its extremely fragile soils.

pg.2
(3) The plan must protect all areas included in the Conservationist's Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas.
(4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your serious consideration of these wildlife and wilderness conservation concerns from all members of the public who are the owners of this land--

Sincerely,
/s/ Sue Nash.

73

xxxxxxxxxxxxxx
xxxxxxxxxxxxxx
March 17, 1995

Bob Ross
Team Leader of Land Management

Dear Mr. Ross,

I, as a public citizen and member of the Sierra Club, am so concerned of the releasing of public lands to oil companies. They will be devastated. We must protect them. That is why they were set aside so they would not be used by private individuals or companies.

Please consider this

Yours truly
/s/ Doris Dieter

74

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

BOB ROSS TEAM LEADER
BUREAU OF LAND MANAGEMENT
P. O. BOX 119
WORLAND, WYOMING 82401

3-16-95

DEAR MR.ROSS,

RE:GRASS CREEK !

MY UNDERSTANDING IS,B.L.M'S PLAN FOR THE GRASS CREEK RESOURCE AREA, IS TO BE 100% LEASED, FOR OIL GAS OEVELOPMENT. I WAVE BEEN IN THE AREA IN 1981, 120 S. FROM CODY ON A RETURN TRIP FROM YELLOWSTONE, THIS AREA IS STILL CLEAR IN MY MIND, AS BEAUTY BEYOND OESCRIPTION, THE ENTIRE BIGHORNE,IS A PLACE OF SCENIC BEAUTY.

THAT'S WHY IT JUST BOGGLES ONES MIND TO THINK, THE AREAS RESOURCES WOULD BE ALLOWED TO BE RAVAGED BY AN OIL OR GAS CO...

I WOULD URGE YOU TO IMPLEMENT AN ALTERNATIVE PLAN,PROTECTING ALL SPECIAL RECREATION MANAGEMENT AREAS,FROM OIL & GAS,AND DESIGNATE THE BADLANDS (SRMA) TO ACEC STATUS.

RESPECTFULLY

WE THANK YOU FOR YOUR TIME

MR.& MRS.ROBERT E. VOGEL

[redacted]

75

Dear Mr. Ross,

I feel that the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek special Rec. Areas should be protected from oil development. Areas like this must not be destroyed for such a temporary gain as a few car drives.

Also, overgrazing is a problem in the Grass Creek Resource Area. This needs to be solved. A timeline of goals needs to be made, so that the problem will be eliminated in the next 5 years.

Thank you,
/s/ Karen Malley

76

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]

March 18, 1995

Bob Ross
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

I urge you to make the following changes in the BLM's Bighorn Basin Plan:

The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should be designated an Area of Critical Environmental Concern because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource Area.

Sincerely,

Sidney Hirsh

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

77

March 17, 1995

Mr Bob Ross
BLM
PO Box 119
Worland WY 82401

Dear Mr Ross,

I am writing to you concerning the management of the Grass Creek Resource Area, and similar areas in general. I am concerned about the effects of large scale oil and gas development in the area.

As the unspoiled natural areas of our nation become more rare, their uses for other than resource extraction increase in value. This is simple economics. Whether for recreation, wildlife habitat, watershed concerns, or whatever, the corporations that seek to profit from our public lands do not have a monopoly on our diminishing resources.

Quite simply, we do not need the oil. We want it, yes. But energy conservation and alternative energy sources are more economical and cost effective and less damaging to the world. You won't hear that from an oil company or a car manufacturer in their denial of the need for change. But it is a fact. Ultimately, we will have to find alternatives to oil and gas as the diminishing supply drives up the cost. Will our natural heritage survive in the meantime? As a taxpayer and part owner in our public lands, I have a vested interest in your answer to that question.

I ask that you consider carefully the information offered by such groups as Sierra Club, whose job it is to monitor the ongoing state of our natural resources. And if in doubt, err on the side of conservation and not the short term desires of the Greed Lobby.

Thank you for your time.

Sincerely,

Jon A McCullough

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

78

Andrew J. Lewis
[redacted]

March 15, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. 119
Worland, Wyoming 82401

Dear Mr. Ross

I am writing in regard to the draft management plan for the Grass Creek Resource Area. Your proposed plan is unacceptable as it stands today. I strongly urge you to make the following changes:
a) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.
b) The Badlands SRMA should be designated an Area of Critical Environmental Concern because of its spectacular scenic qualities and extremely fragile soils.
c) All area's included in the Conservationists' Alternative to the BLM's Wilderness Proposal (including lands outside of WSA's) should be protected.
d) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals within the next five years.
I hope that you will take these steps to avoid the decimation of this unique and beautiful region by uncontrolled oil and gas exploration. Thank you for your attention in this matter.

Sincerely,

Andrew J. Lewis

79

3-15-95

To: Bob Ross, Team Leader
Bureau of Land Management

Please address the following changes in the BLM's Bighorn Basin Plan
-- The Absaroka Foothills, Badlands, Bighorn River, & Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development
--The Badlands SRMA should also be designated an ACEc because of its spectacular scenic & extremely fragile soils
-- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Area
-- Provide more definite goals to address the problems of overgrazing in the resource area, & provide a timeline to accomplish those goals in the next five years.

Thank you for your attention on these matters.

Sincerely,
/s/ Sue Sternhagen
SUE STERNHAGEN
xxxxxxxxxxxxx
xxxxxxxxxxxxx
xxxxx
xxxxxxxxxxxxx

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

80

[redacted]
March 17, 1995

Mr. Bob Ross, BLM Team Leader
Box 119
Worland, WY 82401

Dear Mr. Ross:

Re: No oil/gas leasing Grass Creek Resource Area

Since change in political control the safety and protection of sensitive environmental areas is at stake. The Contract with America is attacking our hard won environmental laws and assaulting our green laws.

Only by carefully protecting the Grass Creek Resource Area can we hold the line against the insidious invasion of the "Mine Out" anti-environment, greedy, money grabbers.

On the positive side, improving range conditions will encourage ecosystem health and biodiversity, of far greater value than money.

Sincerely,

Esther Murray

Esther Johansson Murray

81

3/15

Bob Ross, Team Leader
Dear Bob-

The draft of the mangement plan for the Grass Creek Resource Area must be modified to protect these beautiful lands.

No oil development in Bighorn River, Absaroka Foothills, Red Canyon & Badlands

Badlands is particularly sensitive to exploytation.

These lands are our God given right and should be regarded as such and not subjected to profit taking by oil, mining and grazing interests.

Sincerely,
/s/ Dan Barberis,
xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

82

xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx

March 15, 1995.

Dear Mr. Ross,

I am requesting the following changes in the mangement plan for the Grass Creek Resource Area, since you have not area planned to be free of uncontrolled oil and gas development:-

Protect from oil development the Absaroka Foothills, Badlands, Bighorn River and Red Canyon SRMA.

The Badlands SRMA should also be designated an ACEC because of its spectacular scenic value and extremely fragile soils.

All the areas in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas, should be included in this protection.

Come on, you guys, give us a break!

Sincerely /s/ P.V. Tatterall

RECEIVED
MAR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

83

[redacted]

March 19, 1995

Mr. Bob Ross
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

We are very concerned that the Bureau of Land Management's gas and oil development plans for the Bighorn Basin in Wyoming will destroy the environment and wildlife in that area.

Please do all you can to protect the Bighorn, the Absaroka Foothills, and both the Red Canyon Creek and the Badlands Special Recreation Management areas from gas and oil development.

We request that the Bureau of Land Management provide more definite goals to control overgrazing in these areas (and those lands outside Wilderness Study areas) and a definite time (perhaps 5 years) to accomplish these goals.

We will be anxiously awaiting the results of your team's work.

Sincerely,
Mrs. Ann Klingaman
(Mrs. Ann Klingaman)

(Rev)
Mrs. Warren Ryan, [redacted]
Mrs. Charles Wiesner [redacted]
Mr. Gordon B. Cox [redacted]
Mr. Edward H. Bontwinkel [redacted]
Mr. R. Bruce Okene [redacted]
Mr. Mike Klingaman [redacted]

RECEIVED
MAR 21 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

84

[redacted]

March 17, 1995

Mr. Bob Ross
Team Leader, Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

I am writing in regard to the BLM's recently proposed draft management plan for the Grass Creek Resource section of the Bighorn Basin. This is an area of unique and outstanding natural beauty and is a national treasure that should be, as much as possible, preserved for the enjoyment of present and future Americans.

In effect, however, the proposed management plan would open this entire area to oil and gas development--without any effective restrictions on likely environmental degradation. It does not appear that the proposed ACECs will be adequately protected under the plan.

I join with others in urging the following changes in the proposed management plan:

1.) Ban oil development in the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek SRMA.

2.) In view of its special scenic qualities--and soils vulnerability--designate the Badlands SRMA as an ACEC.

3.) Set aside for protection all areas recommended in the "Conservationists' Alternative to the BLM's Wilderness Proposal," including those lands so recommended that are outside the initial Wilderness Study Areas.

4.) And, establish more definite strategies and goals so as to prevent overgrazing in the resource area, and set up realistic timelines for accomplishing such goals during the next five years.

I feel strongly that this particular scenic, national heritage should be protected--for the benefit and enjoyment of all its owners--the American people--and not given away or sold off on the cheap to business and industrial interests that care only about a short-term profit.

Sincerely yours,
Richard Kiefer

85

PAUL MOSS
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxxxxxxx

3/16/95

Dear Mr. Ross:

I would like to make the following comments on BLM's draft management plan for the Grass creek Resource Area:

1 The Badlands SRMA should be protected from oil development and also should be designated as Area of Critical Concern because of its spectacular scenery and extremely fragile soils.

2 All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal should be protected, including lands outside Wilderness Study Areas.

3 The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management areas should all be protected from oil development.

4 More definite goals should be provided to address the problems of overgrazing in the resource area, and a timeline should be provided to accomplish these goals in the next 5 years.

Thank you for your consideration of these comments.

Sincerely,
/s/ Paul Moss

86

RECEIVED
MAR 21 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Bob Ross, Team Leader
Bureau of Land Management
P.O.Box 119
Worland, WY 82401

Dear Sir:

I have studied the draft management plan and would like to ask for the following changes.

Please designate the Badlands Special Recreation Area as an Area of Critical Environmental Concern because of it's beauty and it's fragile soils.

Protect the Absaroka Foothills, the Bighorn River, the Badlands, and the Red CanyonCreek Special Recreation Management Areas from oil development.

Provide more definite goals to address overgrazing in the area and a timeline to accomplish these goals within 5 years.

Protect all areas included in the Conservationists Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas.

Thank you,
Marlene Tittel
[redacted]

87

RECEIVED
MAR 21 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing in regards to the Grass Creek Resource Area in Wyoming. The Grass Creek area is most likely one of the most diverse area of different climates and landscapes in the West. It deserves a decent amount of protection to preserve its condition for generations to come and enjoy.

I believe that the recent BLM management plan for the Grass Creek Area is too lenient on environmental protection. It allows for 100% of the resource area to be leased for oil and gas development. There are also no alternatives left to look to for more protection, since they all demand that 100% of the Area is to be slated for oil and gas drilling.

I suggest that the following actions should be taken to protect Grass Creek:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas be totally protected from oil development. (Note that the title of these areas is Recreation Management Areas.) Also, the Badlands SRMA should be designated an Area of Critical Environmental Concern, since it contains very special scenic places and very fragile soils.

All the areas in the Conservationist's Alternative to the BLM's Wilderness Proposal lands outside the wilderness study areas should be protected.

Finally there should be a definite plan to deal with the overgrazing problems in the resource area, and deadlines should be set to accomplish the plan in the next five years.

I hope these suggestions will be of help to you and the ecology of the Grass Creek Resource Area. Thank you very much for your time.

Sincerely,
Mr. Shine Ling
Shine Ling

88

RECEIVED
MAR 21 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

March 18, 1995

Mr. Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to you as a concerned citizen for one of the most precious and spectacularly beautiful areas of our great country, the Absaroka Foothills, Badlands, Red Canyon Creek and Bighorn River. These areas are our National Treasures and should be protected. Instead, they are in danger of being exploited by oil and gas developers. I urge you to protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Also, a plan with a realistic implementation timeline is needed to stop overgrazing. We can't afford to lose this most precious of legacies. Please do all you can to help!

Thank you for your attention to this most urgent national priority!

Sincerely,
Carol Carson
Carol Carson
[redacted]

89

March 18, 1995

Dear BLM,

Concerning your plans for the Bighorn Basin's Grass Creek Resource Area:
It is my understanding that you plan to allow oil and gas leasing virtually anywhere in the area. I believe some areas should be protected, such as the Badlands SRMA.
Also, are you preventing overgrazing?
Sincerely, John H. Peck

P.S. No reply needed, and please do not put me on your mailing list to get stuff.

90

xxxxxxxxxxxxxx
xxxxxxxxxxxxxx
March 18, 1995

Dear Mr. Ross:

I am writing concerning the draft management plan for the Grass Creek Resource Area of the Bighorn Basin. I am concerned that too little is being done to protect the natural environment of this area. The draft management plan is much too heavily biased towards oil and gas development.

I support the conservationists' alternative to the BLM wilderness proposal and feel the management plan should be changed to protect all areas in the conservationist's alternative including lands outside the Wilderness Study Areas. I would like the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas closed to oil development. The Badlands Special Recreation Management Area should also be designated an Area of Critical Environmental Concern because of its scenic and fragile soils. I would also like the problems of overgrazing in the resource area to be actively worked with more definite goals and deadlines for reaching these goals in the next five years.

Sincerely,
/s/ Gary L. Westerlund

91

RECEIVED
MAR 22 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

March 17, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
PO Box 119
Worland, Wy. 82401

RE: Grass Creek Resource Area draft management plan

Dear Mr. Ross:

As a visitor to the beautiful state of Wyoming, I read with disappointment of the proposed management plan for the Grass Creek Resource area. The long term, and I emphasize long term, economic and natural health of this State does not lie in extractive industries but in protecting deserving areas from development. Areas of critical environmental concern at the minimum should be afforded protection from gas and oil drilling and its attendant despoliation.

I would ask that all the RRSA and ACEC areas should be deleted from use for oil or mineral extraction and development to preserve their beauty and delicate environment. In particular, the Badlands SRMA should be designated as a ACEC.

The long term health and future of the State must be considered and not just short term extractive needs.

Sincerely,

Edward G. Talbot
[redacted]

92

RECEIVED
MAR 22 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

March 20, 1995

BLM
P.O. Box 119
Worland, WY 82401

Dear Bob Ross,

I am writing in response to protest the current management plan for the Grass Resource Area of the Bighorn Basin. This unique and vital habitat is in danger of being irreversibly damaged. I urge you to reconsider the management plan and take into consideration the following requests:

-Protect the Absaroka Foothills, Badlands, Bighorn River, and SRMA from oil development
-Designate the Badlands SRMA as an ACEC
-Protect all land included in the Conservationists' Alternative to the BLM's Wilderness Proposal including the lands outside the Wilderness Study Areas
-Address the issues of overgrazing in the resource area, set goals to remedy the problems, and accomplish them within 5 years

The destruction of this land for the short term benefits of oil, gas and beef insure be a great loss to my generation and all generations to come. As a non-voting citizen, my only voice is through letters. I believe that the remarks stated in this letter are statements that many would support - so please, reconsider your plan. Thank you.

Sincerely,

Tammy Lim

93

Mar 20, 1995
xxxxxxxxxxxx
xxxxxxxxxxxx
xxxxxxxxxxxx

Dear Mr Ross,
The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic value and extremely fragile soils. The BLM should protect all areas included in the Conservationists' Alternative to the BLM Wilderness Proposal including lands outside Wilderness Study Areas. The above changes should be made to the management plan for the Grass Creek Resource Area.

Sincerely, /s/ Shelley Ellis

94

RECEIVED
MAR 22 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

James A. Parker
[redacted]
March 16, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

This letter is to register my very strong opposition to the current draft management plan for the Grass Creek Resource Area. If implemented, it will permit virtually uncontrolled oil and gas development in this area. I have travelled extensively in Wyoming, which is probably my favorite state for vacations. The area in question is undoubtedly one of the most beautiful in the state. To desecrate it with the man made devastation which always accompanies hitherto uncontrolled oil and gas development is against nature. The following changes should be made to your plan:

1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) must be protected from oil developments, and the Badlands SRMA also should be designated as Area of Critical Environmental Concern (ACEC) because of its spectacular scenery and extremely fragile soils.
2. All areas included in the Conservationists Alternative to the BLM's Wilderness Proposal, including outside the Wilderness Study Area, should be preserved.
3. More definite goals to address the problem of overgrazing in the resource area should be provided, as well as a time table to accomplish the goals within the next five (5) years.

Sincerely,

James A. Parker

95

RECEIVED
MAR 22 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

Elise Auerbach
[redacted]
31 March 1995

Mr. Bob Ross
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to you to express my deep concern over the Bureau of Land Management's draft management plan for the Grass Creek Resource Area in the southwestern quarter of Bighorn Basin in Wyoming. The plan calls for uncontrolled oil and gas development in the Grass Creek Resource Area. I believe if this plan is implemented, it will result in irreversible destruction to this unique and beautiful area, which encompasses impressive badlands as well as important rock art.

I am very concerned that the draft management plan allows 100% of the resource area to be leased for oil and gas development. I think it is very important to protect many areas of iconic value and ecological importance. I therefore propose the following changes to the management plan:

1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

2. All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal should be protected, including lands outside wilderness study areas.

3. The plan should include more definite measures to address the problems of environmental damage caused by overgrazing in the resource area, and should provide a timline to accomplish these goals in the next five years.

I believe that the Grass Creek Resource Area, because it is public land, belongs to the American People and should be managed for the good of the general public and for future generations, and not just for the short-term profits of some greedy oil and gas developers. Thank you very much for your attention.

Sincerely,
Elise Auerbach

96

Dear Leader Ross; 3/95
I am writing to express my concern about the BLM draft management plan for Grass Creek Resource Area. I would like to ask for the following changes:
1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon (SRMA should be protected from oil development.
2) The Badlands (SRMA) should be protected and designated an ACEC because of its spectacular scenic and extremely fragile soils.
3) Protect ALL areas included in the Conservationists' Alliance to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next 5 years.

Thank you,
/s/ John Pangeria

97

BLM Team Leader, 3/21

In your management plan for the Grass Creek Area, I think you need to protect more areas (along with the Meeteetse Draw & Upper Owl Creek) from the damages that accompany oil & gas exploration and unrestricted ORV use.

These places have greater value as they are than they have for what can be taken out of them. Plus, the more they are used with out thoughtful restrictions, the more it eventually costs us tax payers to fix the damage.

We all need to learn how to enjoy the public lands without messing them up.

Extractive industries and ORV users don't seem to have these concerns for protecting the resource. Put it in your plan please.

Tks

/s/ Gene Ball

98

To Whom It May Concern --

I am writing today in support of the Absaroka Foothills, Badlands, Bighorn River, & Red Canyon Creek Special Recreation Managment areas being protected from oil development. The Badlands should be designated an Area of Critical Enviroment Concern. There should be protection of the areas included in the Conservationists Alternative to the Bureau of Land Managements' Wilderness Proposal, also lands outside Wilderness Study Areas. Lastly, there needs to be goals regarding the problems of overgrazing with a timeline of good accomplishment of some in the next five years.

Sincerely --

/s/ Pat Woolfitt
Sierra Club member

99

RECEIVED
MAR 23 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

Bob Ross
Team Leader
Bureau of Land Management (BLM)
P.O. Box 119
Worland, Wyoming
82401

March 21, 1995

Mr. Ross,

The proposed plan to make 100% of the Grass Creek Resource area available to lease for oil and gas development was recently brought to my attention. The lack of adequate protection for special management areas here was also brought to my attention.

The BLM draft management plan does not seem to consider leasing any less than 100% of the resource area for oil and gas development. The plan also does not address the adequacy of protection levels for special management areas or Areas of Critical Environmental Concern (ACEC).

My understanding is the BLM is more knowledgeable about certain aspects of land management, like leasing government property for grazing, mining, or drilling. Attention to environmental issues is also very important.

To show your concern for the Grass Creek Resource Area, include the following changes in the draft management plan in order to protect the area from uncontrolled oil and gas development:

1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from Oil development.

2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness proposal including lands outside Wilderness Study Areas.

4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a time line to accomplish those goals in the next five years.

If there is a chance that the BLM could look past the prospect of oil and gas leasing revenues and include environmental protection in the plan, our environment will be better protected, the BLM will have served as a custodian with a conscience for the Bighorn Basin, and the maintenance of one of the most beautiful parts of Wyoming will have been sustained, not destroyed.

Sincerely,

Tom McKendall

100

18 March 95

Bob Ross
BLM
P.O.B. 119
Worland, Wy 82401

Dear Sir,

It has come to my attention that the management plan for Grass Creek Resource Area provide insufficient protection to the land and its resources. As a citizen of the United States, it is my wish to see this parcel, and all other held in the common trust, protected to the fullest extent possible.

The following changes should be considered and integrated into the management plan:

1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Managment Areas should be fully protected from oil development.

2) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas.

4) Provide more definitive goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals over the next five years.

I remind you that your primary duty as a government is to the people of the United States, not to extractive, exploitative industries. Thank you for your attention to this matter.

Sincerely,
/s/ Andrea E Gruszecki
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx

101

RECEIVED
MAR 23 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

March 19, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross,

I am writing to recommend that you make the following changes in the draft management plan for the Grass Creek Resource Area in Wyoming:

- Protect the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas from oil development;
- Designate the Badlands SRMA an Area of Critical Environmental Concern because of its spectacular scenic and extremely fragile soils;
- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas;
- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years

Thank you for your consideration of these items.

Sincerely,

D. DeProspero

D. DeProspero
[redacted]

102

United States Department of the Interior
FISH AND WILDLIFE SERVICE
ECOLOGICAL SERVICES
4000 Morrie Avenue
Cheyenne, Wyoming 82001

RECEIVED
95 MAR 23 AM 8:53
BLM, WORLAND D.O.

IN REPLY REFER TO

ES-61411
MEI/W.02(gcrmpbs.com)

March 19, 1995

Memorandum

To: Area Manager, Bureau of Land Management, Grass Creek Resource Area, Worland, Wyoming
Attn: Marian Atkins

From: Wyoming Field Supervisor, Ecological Services, Cheyenne, Wyoming

Subject: Draft Environmental Impact Statement on the Grass Creek Resource Area Resource Management Plan (Draft Statement) and Biological Assessment (Assessment) for Draft Statement

Thank you for the opportunity to review the subject documents. The U.S. Fish and Wildlife Service (Service) was forced to delay its response to the Assessment pending receipt of information contained in the Draft Statement. We apologize for any inconvenience. My staff has reviewed the Assessment, as well as the Draft Statement and offers the following comments.

OIL AND GAS

The Service is concerned with designating nearly the entire area open to oil and gas development rather than identifying certain sensitive and valuable areas as administratively withdrawn. While the analysis and development of site specific protective stipulations is meant to occur later in the process, typically, the analyses that occur prior to leasing decisions are based on inadequate data and are generally deficient in cumulative effects analyses, if done at all. Often the stipulations attached to oil and gas leases are insufficient to adequately protect fish and wildlife resources. For example, traditional timing restrictions provide little long-term protection for wildlife, since the restrictions are usually imposed only during exploration and development, while the impacts to wildlife continue to occur through production. The Service did note the Draft Statement's explanation that Controlled Surface Occupancy (CSO) constraints place limitations on the operation and maintenance of facilities. Since most references to CSOs applied to the exploratory phase, and required more than 20 percent direct surface disturbance, we are uncertain of the extent of protection actually provided by this stipulation. Please provide us with more details on the CSO stipulation.

The Service also remains concerned with the use of No Surface Occupancy (NSO) stipulations in place of administratively unavailable designations. Stipulations, including NSO, may be

102.2

2

waived or modified without appropriate review, thus precluding adequate evaluation of the environmental consequences. Furthermore, courts have recognized that the issuance of a lease represents an irretrievable and irreversible commitment of resources. The Service contends that such commitment necessitates adequate review and assessment of impacts that, perhaps, should be avoided to fully protect the environment. The discussion of environmental consequences resulting from gas and oil activities (page 191 of the Draft Statement) better addresses impacts of restrictions to the cost of exploration and development rather than environmental consequences of the action. The Service also remains concerned with the Bureau's legal ability to deny development if a site specific analysis indicates unacceptable environmental consequences will occur. Please provide us with the opportunity to discuss these concerns with you in the near future.

THREATENED AND ENDANGERED SPECIES, GENERAL

The Draft Statement provides few details on threatened and endangered (T/E) species. A more in depth discussion of the species' occurrence in the planning area and the project's potential impacts to them is needed in the Draft Statement. Since the Assessment provides more details, we believe it would be helpful to attach the Assessment to the Final Environmental Impact Statement as an appendix. This would facilitate full disclosure of project impacts.

The discussion of listed species' presence in the planning area (page 150 of the Draft Statement, as well as throughout the Biological Assessment) is quite limited and somewhat unclear, particularly with respect to grizzly bears and wolves, making it difficult to determine what impacts are a real possibility. Neither document provides detailed descriptions or maps of listed species' distributions or sightings. While we acknowledge that it may not be prudent to provide maps of a sensitive nature (such as bald eagle nest sites), it is unfortunate that detailed locational information is presented only for game animals. Please provide the Service with more information on the extent, nature, and results of surveys for T/E species.

More details should be provided to explain why each alternative does not effect T/E species. Based on your December 14, 1994, memo accompanying the Assessment, the Service understands the Bureau of Land Management (Bureau) has determined the preferred alternative will have no effect on any listed species. This determination is not clearly made in the Draft Statement. Instead, the Draft Statement indicates there will be "no significant effect." To ensure compliance with section 7 of the Act, the statement should be worded to indicate that alternatives will have "no effect" or are "not likely to adversely affect" T/E species. While the Assessment addresses only the preferred alternative, the Draft Statement provides a very brief summary of the environmental consequences to threatened and endangered wildlife species for each alternative, but gives no explanation of how these consequences were derived. The Service questions how each of the varied alternatives has identical environmental consequences for threatened and endangered wildlife species, namely no significant effect.

102.3

3

BALD EAGLE

I commend you for your commitment to protect bald eagle roosting and perching habitat by allowing no cutting of desert cottonwoods and protecting the Big Horn and Greybull river corridors from development on public land tracts. I am uncertain whether only desert cottonwoods are used as roosts and perches in the area. If other structures (such as other tree species or utility poles) serve as roosts and perches, please explain how they will be protected. While the Service concurs with your intention to protect the public lands along the rivers from development, I would appreciate more details on how this will be done. Also, please provide more information on potential impacts that may result from oil and gas development, recreation, grazing, and other land uses along the river, as well as measures to protect the eagles from adverse impacts associated with these activities. For example, grazing has the potential to impact eagles if cattle graze on cottonwood regeneration areas, thus limiting future roost/nest sites when older, decadent trees are lost. Furthermore, the Draft Statement indicates emphasis will be placed on acquisition of access to public lands on the Bighorn and Greybull rivers to enhance recreational opportunities and wildlife management. Enhancement of recreational opportunities may not be compatible with protection of eagle roosts and perches.

PEREGRINE FALCON

While we concur that only marginal, and probably currently unoccupied, habitat for peregrine falcons is found within the planning area, the Service is unsure how long the habitat will remain unoccupied. Please provide details on any surveys that will be conducted in the future to determine peregrine occupancy. The Service also concurs that designation of upper Owl Creek as an Area of Critical Environmental Concern (ACEC) will help protect potential habitat in that vicinity. We remain uncertain, though, of the amount of protection that will be provided in the South Fork of Owl Creek Canyon. Please provide us with more details.

BLACK-FOOTED FERRET

The Service recognizes that ascertaining whether ferrets are present in prairie dog colonies prior to surface disturbances will prevent direct adverse impacts to black-footed ferrets, but we question how this will address the long-term recovery of ferrets if no protection is provided for potential habitat. If large prairie dog complexes are found within the planning area, consideration should be given to maintaining these prairie dog complexes, not only for future use by ferrets, but also to protect the biodiversity found within this rich habitat. Please provide the Service with details on efforts to date, as well as future plans, to map prairie dog complexes in the Grass Creek Resource Area and general information on significant complexes identified in the area (including location, size, and proximity to other complexes).

GRAY WOLF

Information on the possibility of wolf occurrence in the planning area is somewhat vague. Please provide more information on the sightings and other indications of wolf presence in the planning area, including location, date, and credibility of the reports. While wolves in the vicinity certainly might be helped if their prey base is adequately protected, protection of wintering big game populations would not fully protect wolves. Has any kind of contingency plan been developed in case wolves eventually inhabit the planning area?

GRIZZLY BEAR

The discussion of grizzly bear presence in the planning area is somewhat unclear in both the Draft Statement and the Assessment. Does the information include reports from 1994? It is our understanding that a grizzly bear was found feeding on a dead cow at the head of Gooseberry Creek, as well as two confirmed incidents and several sightings in the Grass Creek vicinity. Please provide more detailed information on grizzly bear sightings in or near the planning area.

The Assessment seems to rely heavily on the Management Situation (MS) 5 designation and associated Interagency Grizzly Bear Committee Guidelines to defend the "no significant effect" determination given in the Final Statement. The MS 5 designation provides only guidance and cannot be used to verify that habitat is unoccupied, determine that federal activities will not affect the species, or conclude that grizzly bears need not be considered when making management decisions (particularly under section 7 (a)(2) of the Act). Nor does the MS 5 designation negate the Bureau's responsibilities to carry out programs to conserve endangered and threatened species as outlined in section 7 (a)(1) of the Act and in the Bureau's 6840 manual.

The Assessment needs to be expanded to include discussion of increased access, recreation, oil and gas, range management (particularly potential for livestock depredations), and potential impacts to the grizzly bear resulting from these activities. Consideration of impacts to grizzly bears occurring outside the planning area should also be discussed, as activities within the planning area (such as improved access to National Forest lands and increased recreation on those lands) may impact bears outside the planning area.

The fourth paragraph on page 21 of the Assessment should be amended to indicate that insufficient regulation of bear attractants in camping areas may cause problems for grizzly bears. Discussing problems caused by bears, as in the current wording, is inaccurate and judgmental.

Based on information provided in your June 2, 1994, Upper Owl Creek Access Easement Biological Assessment, it was the Service's understanding that the Bureau intended to implement use restrictions to reduce/eliminate attractants as well as a seasonal closure of that

area. Are those restrictions currently in place? This Assessment for the Resource Management Plan indicates that these types of restrictions are merely being considered for future use.

Please provide more information on measures to reduce impacts to grizzly bears, including details of anticipated public education programs, sanitation regulations (including how the determination will be made to implement such regulations), and other mitigation designed to minimize impacts from habitat alteration.

CANDIDATE SPECIES

The discussion of candidate species occurring in the project area (page 150 of the Draft Statement) is incomplete. The Draft Statement should address the occurrence of and potential impacts to the following species, based on information provided in Federal Register volume 59, number 219, November 15, 1994.

Species	Category*	Expected Occurrence
Mammals		
Spotted bat *Euderma maculatum*	2	Big Horn County
Townsend's big-eared bat *Plecotus townsendii pallescens*	2	Deciduous forests, dry coniferous forests, basin-prairie and mountain-foothills shrublands, desert grasslands
Small-footed bat *Myotis ciliolabrum*	2	Non-mountainous area statewide
Long-eared bat *Myotis evotis*	2	Coniferous forests, riparian, prairie shrublands, and sagebrush grasslands
Long-legged bat *Myotis volans*	2	Widely distributed statewide
Yuma bat *Myotis yumanensis*	2	Prairie/shrublands of northcentral Wyoming
Allen's 13-lined ground squirrel *Spermophilus tridecemlineatus allenl*	2	Western slope Bighorn Mts. & upper Green River.
North American wolverine *Gulo gulo luscus*	2	Mountains statewide
North American lynx *Felis lynx canadensis*	2	Mountains statewide

Birds		
Trumpeter swan *Cygnus buccinator*	2	Northwestern Wyoming
White-faced ibis *Plegadis chihl*	2	Wetlands statewide
Harlequin duck *Histrionicus histrionicus*	2	Rivers in northwest Wyoming
Ferruginous hawk *Buteo regalis*	2	Grasslands statewide
Northern Goshawk *Accipiter gentilis*	2	Forests statewide
Western burrowing owl *Athene cunicularia*	2	Prairie, grasslands, and agricultural lands
Mountain plover *Charadrius montanus*	1	Grasslands statewide
Western snowy plover *Charadrius alexandrinus*	3C	Shorelines of aquatic areas
Long-billed curlew *Numenius americanus*	3C	Grasslands/wetlands
Black tern *Chlidonias niger*	2	Wetlands statewide
Loggerhead shrike *Lanius ludovicianus*	2	Woodlands/shrublands
Baird's sparrow *Ammodramus bairdii*	2	Shortgrass prairie
Amphibians		
Western boreal toad *Bufo boreas boreas*	2	Medicine Bow Mts., western Mts.
Spotted frog *Rana pretiosa*	2	Northwest Wyoming; Yellowstone National Park
Reptiles		
Eastern short-horned lizard *Phrynosoma douglassii brevirostra*	2	Statewide in non-mountainous areas
Fish		
Sturgeon chub *Macrhybopsis gelida*	1	Powder & Bighorn rivers
Flathead chub *Platygobio gracillis*	2	Platte, Cheyenne, Belle Fourche, Little Missouri, Powder, Tongue, and Bighorn rivers

Western silvery minnow *Hybognathus argyritis*	2	Bighorn and Powder rivers
Plains minnow *Hybognathus placitus*	2	Platte, Cheyenne, Belle Fourche, Powder, and Bighorn rivers

*1 = Federal listing appears appropriate and is anticipated. 2 = Current data insufficient to support listing. 3C = More widespread or abundant than previously believed, or no immediate threats identified.

Many Federal agencies have policies to protect candidate species from further declines. It is our understanding that guidance provided in the Bureau's 6840 manual directs Bureau personnel to provide protection adequate to prevent the eventual listing of candidate plants and animals. Neither the Draft Statement nor the Assessment is clear about how this is being accomplished.

After careful review of the Statement and the Assessment, the Service does not anticipate problems with providing our concurrence upon receipt of the information outlined above and discussions to address our concerns. My staff looks forward to working with your staff. If you have any questions regarding our review of the documents, please contact Mary Jennings of my staff at the letterhead address or phone (307) 772-2374.

Charles F. Davis

cc: Director, WGFD, Cheyenne, WY
Nongame Coordinator, WGFD, Lander, WY
Kevin Hurley, WGFD, Meeteetse, WY

103

XXXXXXXXXX
XXXXXXXXXXXXXXXXXXXXXX
March 21, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O.Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I would like you to make the following changes in the management plan.

The Absaroka Foothills, Badlands, Badlands, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

The Badlands SRMA should also be designated an ACEC because of its scenic and extremely fragile soils.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

Sincerely yours,
/s/ Theresa Hastings

104

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]
March 20th, 1995

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I fear that the draft management plan for the Grass Creek Resource Area will permit virtually uncontrolled oil and gas development in the northwestern quarter of the Bighorn Basin. This is one of the most beautiful areas of Wyoming, where one can see the sharp contrast and beauty of Wyoming landscape from arid deserts to lush montane forests. Such areas of great beauty should not be subjected to the oil and gas development allowed for the draft management plan.

I urge that the draft management plan be revised in 4 key ways. The first being that the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek SRMA be protected from oil development. We should not tear the landscape of such a beautiful area by allowing for oil development. Secondly, I feel that more definite goals addressing the problems of overgrazing in the resource area should be made, as well as a timeline to accomplish these goals in the next five years.

Some more areas that need greater protection are all the areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas. The Badlands SRMA should also be redesignated an ACEC because of its spectacular and extremely fragile soils.

Thank you.

Sincerely,
Abby Melton
(Abby Melton)

105

RECEIVED
MAR 2 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]
March 20, 1995

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

I'm writing to comment on the BLM draft management plan for the Grass Creek Resource Area in the Bighorn Basin. I urge you to make the following changes in the management plan:

1) Protect the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek SRMAs from oil development.

2) Designate the Badlands SRMA an ACEC because of its spectacular scenic and very fragile soils.

3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

4) Set up more definite goals to address the problems of overgrazing in the resource area, and establish a timeline for accomplishing those goals over the next five years.

Thanks very much for considering these suggestions, and for working to preserve the beauty of the Bighorn Basin.

Yours sincerely,
Jennifer Howard

Jennifer Howard

106

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

March 20,1995

Mr. Ross:

I am writing due to my concern over BLM's proposed plan for Grass Creek. This is one of the most beautiful areas of Wyoming and I would hate to see it destroyed by laissez faire management practices. Such areas do not prosper from oil and gas development.

I believe that the Absaroka Foothills, Badlands, Big Horn River and Red Canyon Creek SRMA should be protected from oil development.

I believe the Badlands SRMA should also be designated an ACEC due to its beauty and fragile soils.

I believe that the BLM should protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal.

I have enjoyed my visits to the area in question and my heart would be broken if it were irrevocably damaged by short-sighted development for a non-renewable resource. If in time that America stopped plundering the remaining beauty of our country and look for alternative long term solutions to our energy needs.

Thank you for your consideration.

Sincerely,
Terry Fielder
[redacted]
(703)456-8609

107

William L. Simerly
Lori S. Simerly
[redacted]

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

20 March 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

The Grass Creek Resource Area is in one of the most beautiful parts of Wyoming. We are concerned that BLM's new draft management plan for the area will not adequately protect it from the destructive effects of oil and gas development. We ask that the following changes be made to the plan:

- The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreational Areas should be protected from oil and gas development.
- The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and fragile soils.
- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your time.

Sincerely,

Bill Simerly Lori Simerly

108

xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxx

3/18/95

Bob Ross, Team Leader
BLM
P.O. Box 119
Worland, Wyoming, 82401

Dear Mr Ross

Wyoming's wilderness lands must be protected from the adverse effects of massive oil and gas development.

I urge you to change your management plan for the Grass Creek Resource Area. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Managment Areas must be protected from oil development!

None of the alternatives consider protection of Wilderness Areas. Your management plan allows for all of the Grass Creek resource area to be leased for oil and gas development. I urge you to protect all the areas included in the Conservationists' Alternation to the BLM's Wilderness Proposal. The Badlands SRMA should be designated an ACEC. The management plan must also address problems of overgrazing in the area. The Bureau of Land Management must protect the American land!

Sincerely Yours

/s/ Peter Zadis Peter Zadis

Katherine Johnson

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

109

[redacted]

March 16, 1995

Mr. Bob Ross
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I am writing to you at the request of my local Sierra Club Chapter to ask for the following changes in the management plan.

1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Crek Special Recreation Management Areas (SRMA) should be protected from oil development.

2) The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your time and attention to this very important and complicated issue in Land Management.

Sincerely yours,

Katherine Johnson

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

110

Team Leader
Box 119
Worland, Wyoming 82401

[redacted]

March 22, 1995

Dear Mr. Ross:

The Bureau of Land Management is planning to allow 100% of the resource area in the Grass Creek Resource Area of the Bighorn Basin to be leased for oil and gas development. This proposal ignores the critical need to protect several fragile areas. Areas that should be addressed are:
-The Absaroka Foothills, Badlands Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be placed in protection from oil development.
-The Badlands SRMA has such extremely fragile soils that fuel development will cause major damage and erosion.
-All areas that are included in the Conservationists' Alternative to the BLM's Wilderness Proposal should be protected, including lands outside Wilderness Study Areas.
-Overgrazing in the resource area is a major problem. Rangelands are in very poor condition in many areas. Ignoring the problems and permitting continued overgrazing will only increase future problems. This will cost the BLM drastic solutions down the road. That will satisfy no one. Definite goals to address this problem within the resource area should be provided, with a timeline to accomplish them within the next five years.

There is pressure by oil and gas companies to exploit every possible area for development. I feel that some areas are both more valuable as natural areas or for recreation. They deserve protection as they are. Even with the above mentioned areas protected there remains a vast amount of land available for resource development. Please review the BLM development proposal and grant protection to the afore mentioned areas.

Sincerely,

Dianna M. Brown

Diana M. Brown

RECEIVED
MAR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

111

Jeremy Kamil
[redacted]

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I am presently taking this time to write you to inform you as to my high level of concern as a citizen of this country, and as a fellow human being who understands that you possess a great deal of responsibility as to deciding the future of a peerless resource. I am shocked to have heard that all of the options on the table for the management of Grass Creek Resource Area impose a laissez-faire system of oil and gas development on 100% of the area. As a biology major, I am aware of how little even the experts know about the full extent of any impact our activities have on the dynamics of an ecological system, and I hope that we can limit the impact of the oil lease in the Bighorn Basin if we consider some of the following points. I will tell you specifically what I have in mind as the responsible option to ensure the principles of multiple-use are considered from as objective a standpoint as is possible.

I believe that the three designated ACEC sites need to have more stringent enforcement and protection measures. The Absaroka foothills, Badlands, Bighorn river, and Red Canyon Creek Special Recreation Management areas should definitely be protected from any level of oil development. Because of its extremely scenic landscape, and also its particularly fragile soils, the Badlands SRMA should be designated an ACEC. I also implore you to protect all of the areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including areas outside the Wilderness Study Areas. Finally, please consider providing more definite goals to address the problems of overgrazing in the resource area, and please provide a timeline to accomplish these goals in the next 5 years.

Thank You.

With utmost sincerity,

Jeremy Phillip Kamil

112

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Grybull, WY 82426-0063

[Same as Letter #1]

...

Additional comments:
YOU SHOULD READ THE CONSTITUTION OF THE UNITED STATES & OF WYOMING SOME TIME.

Name: R. E. Riddle
Mailing address: xxxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxxx

Signed: /s/ R. E. Riddle Date: 3/25/94

RECEIVED
MAR 27 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WY 82401

113

Rich P. Shefferson
[redacted]
March 22, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I am very concerned by the draft management plan your agency has released for the Grass Creek Resource Area. Protection and conservation, it seems, are barely even mentioned. Sending over this resource area for oil and gas development would be a big mistake for the BLM. Grass Creek is undoubtedly one of the most marvelous parts of Wyoming.

I ask that you modify the management plan so that: the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas become protected from oil and gas development; the Badlands SRMA become designated an Area of Critical Environmental Concern (due in part to its extremely fragile soils); all areas included in the Conservationists' Alternative to the BLM Wilderness Proposal become protected (including lands outside Wilderness Study Areas); and that more definite goals and timelines to address the problem of overgrazing in the resource area become instituted.

Thank you for your time.

Sincerely,

Rich P. Shefferson

114

3-21-95

Dear Mr. Ross,

As someone who enjoys the wide open spaces of the American West, I request that you do all in your power to protect the Wyoming SRMAs from development, strictly enforcing ACEC against overgrazing and oil/gas exploitation. Thank you for helping to save the natural beauty of the Badlands, the Absaroka Mountains, Red Canyon, and the Bighorn River.

/s/ John Maybury

xxxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx

RECEIVED
MAR 2 7 1995
BUREAU OF LAND MANAGEMENT

115

March 21, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Mr. Ross:

I would like to comment on some proposals in the draft management plan for the Grass Creek Resource Area which I believe would be harmful to this extremely beautiful and sensitive area.

The plan allows for 100% of the resource area to be open to leasing for oil and gas exploration. This is a wasteful and damaging policy, since areas once roaded and drilled can never be restored to their present condition and may be gone forever.

While the plan designates three special management areas for areas of critical environmental concern, criteria of management are more lax than would be necessary to actually protect these areas from degradation under the rest of the plan.

I believe that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas in particular should be completely and permanently protected from oil and gas development. These scenic areas would be irreparably damaged if drilling and road building were allowed there.

The Badlands recreation area should be designated an area of critical environmental concern because its scenic beauty is so fragile and vulnerable to erosion.

The conservationists alternative lists important areas which should be added to the list of protected areas.

Overgrazing poses a threat to the fragile soils and sensitive flora of these areas and should be specifically addressed in the management plan.

I hope that these comments will be seriously considered in amending the plan before it goes into effect. Remember, lands once degraded may be gone forever.

Sincerely yours,

Mary Ellen Clinton
Diana Kaye

Mary Ellen Clinton
Diana Kaye

116

xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx
March 23, 1995

Mr. Bob Ross, Team leader
Bureau of Land Management
P.O.Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

The following changes are needed in the management plan for the Grass Creek Resource Area;

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Sincerely yours,

/s/ Theresa A. Hastings

117

[LAST NAME ILLEGIBLE]

I'm writing to request that you consider a Conservation Alternative for the Grass Creek Resource area. You should prohibit sensitive areas from oil & gas leasing, and limit ORVs to existing roads and trails - not in roadless areas and wilderness Study areas. There's plenty of places for them to ride without going into the wildest, most sensitive areas! Thanks. /s/ CR [Build], xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

RECEIVED
MAR 2 7 1995
BUREAU OF LAND MANAGEMENT

118

March 22, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

This letter is in regards to the draft management plan for the Grass Creek Resource Area of the Bighorn Basin. We object to the allowance of 100% of the resource area to be leased for oil and gas development.

We urge you to add the following changes to the management plan:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should be designated an Area of Critical Environmental Concern (ACEC) because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Sincerely,

Cheryl Bluestein
Jordon Bluestein

Cheryl and Jordon Bluestein

RECEIVED
MAR 2 7 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

119

March 23, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr Ross;

The Grass Creek Resource Area is one of the most beautiful areas of the United States. It would be a real tragedy to see it decimated by oil and gas exploration. I urge you to consider the following changes in the management plan:

1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

2) The Badlands SRMA should also be designated an ACEC because of it's spectacular scenic and extremely fragile soils.

3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Thank you for your consideration.

I remain,

Robert E Fullerton

Robert E Fullerton
[redacted]

120

Olga M. Rosche'
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx
March 23, 1995

Mr. Boss Ross, Team Leader
Bureas of Land Management
P. O. Box 119
Worland, Wyo. 82401

Dear Mr. Ross,

I am opposed to uncontrolled oil and gas development in the Grass Creek Resource Area (southwest corner of the Bighorn Basin).

I suggest these changes:

- These parts should be protected from oil development,--Absaroka Foothills. Badlands. Bighorn River, Red Canyon Creek Special Management Areas.
- The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and very fragile soils.
- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Study Area.
- Provide more definite goals to change the problem of overgrazing & provide a timeline to setup goals for the next five years.

Yours truly,
/s/ Olga Rosche'

121

xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx
March 23, 1995

Mr. Robert Ross
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

It is a real shame the way some of the most gorgeous parts of our country go the way of oil development.

Now, I read the absaroka Foothills, Badlands, Bighorn River, Red Canyon Creek Special Recreation Management areas are in the draft plan of the Bureau of Land management for oil and gas development.

I strongly ask these spectacular scenic areas be spared.

Sincerely yours,

/s/ Lillian A. Snider

122

March 23 '95

Bob Ross, Team Leader
Bureau of Land Management
P.O Box 119
Worland. WY. 82401

Dear Mr. Ross.

Re the draft management plan for the Grass Creek Resource Area, I urge the following changes:

1. The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas should all be protected from oil development.
2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils
3. Protect all areas included in the Conservationists Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timetable to accomplish those goals in the next five years

/s/ Jack Robbins
xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

RECEIVED
MAR 2 7 1995
BUREAU OF LAND MGMT.
BIG HORN BASIN

123

March 23, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing about the draft management plan for the Grass Creek Resource Area. I am requesting the following changes in the plan:

- The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

- The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragil soils.

- Protect all areas included in the conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your attention.

Sincerely yours,

Brian + Barbara Commes

Barbara & Brian Commes

124

To: Bob Ross, Team Leader 3/21/95
BLM
POB 119
Worland Wyoming. 82401

From: Victor Parra
xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx

Re: BLM Bighorn Basin Plan

I would like to see the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas protected from oil development. The last thing we need in these kinds of Areas is oil- oil companies! Also, the Badlands SRMA should be designated an ACEC because of it's spectacular beauty. In addition, I ask that you protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Lastly, regarding over-grazing in the resource area, pees please provide specific goals & timeline for accomplishment. Thank-you

/s/ Victor Parra

P.S. If you want to learn more about how to mess up a place by over-developing it, come to L.A.!

125

3/19/95

Mr. Bob Ross, Team Leader
Bureau of Land Management
PO Box 119
Worland, Wyoming 82401

My dear Mr. Ross:

In the name of my children and grand-children and your children and grandchildres I urgently request the following changes in BLM's Bighorn Basin Plan:

1. The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas protected from oil development.
2. The Badlands SMMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.
3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Help save the wonders of our beautiful country for the many.

Yours sincerely,
/s/ Deborah Slosser

xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx

126

xxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx
xxxxx
March 22, 1995

Dear Mr. Ross:

I understand that the BLM recently released a draft management plan for the Grass creek Resource Area and I would like to register with you some concerns that arise from a review of the plan.

Please consider designation of the Badlands Special Recreation Management Area as an Area of Critical Environmental Concern. The fragile nature of the soils and topography of this area certainly warrant the greater protection that would come with designation as an ACEC.

Please consider closing your ACEC's and SRMA's to oil and gas leasing. From past experience on BLM lands, I have seen the negative impacts of oil and gas leases on the environmental. I am surprised that your draft suggests that oil and gas leasing would be compatible with wildlife, scenery, and environmental concerns and I urge you to close all of your SRMAs and ACEC's to oil and gas leasing.

Also I was concerned that the Wilderness Study Areas would not be afforded greater protection and I urge you to do all in your power to ensure that these key WSA's and the adjoining lands be closed to non-compatible uses like oil and gas leasing.

Thanks for listening

/s/ Paul J Farley

127

Mr. Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, WY - 82401

Dear Sir: This letter is in reference to the development of the Grass Creek Resource area in the Big Horn Basin.

I am very much against the uncontrolled (and controlled, also) development of Oil and Gas in this very beautiful part of the state. I have been to Wyoming and it is one of our most beautiful states! It is a shame to clutter all of that wild, natural beauty with oil rigs, and stuff.

I request the following changes in the management plan:

1. Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management areas (SRMA) should be protected from oil & gas development.
2. Protect all areas included in the conservationists' alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
3. Badlands SRMA should also be designated an ACEC because of spectacular beauty and extremely fragile soils.
4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline of five years to accomplish those goals.

My son is planning on a trip to Wyoming, and I want him to see the same natural beauty that I was privileged to see, not the ugly blight of oil and gas exploration.

You lucky people there may take your beautiful state for granted, but to us easterners, who do not have much spectacular visits as Wyoming, do appreciate the glory of God's gift to you all!

Thank you and Most sincerely,

Mrs Kathie S. Ritchey
xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx
xxxxx

128

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:

I would like to know why the private lands along the Big Horn and Grey Bull river drainages are included in the Grass Creek Resource Area?

Name: James D Miller
Mailing address: xxxxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxxxx

Signed: /s/ James D Miller Date: 3/25/94

129

RECEIVED
MAR 2 7 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

Mr. Bob Ross
Team Leader
Bureau of Land Management
P O. Box 119
Worland, Wyoming 82401

Re: BLM'S Big Horn Basin Management Plan for the Grass Creek Resource Area

Dear Mr. Ross,

I love the State of Wyoming, particularly the Big Horn Basin. I am a native of the Big Horn Basin, having lived in Lovell, Burlington, Grass Creek, and Thermopolis. I graduated from Lovell High School. My grandfather George Allphin, came to the basin before the turn of the century and hundreds of his descendants live throughout the State. My wife Gail was born in Lovell and her grandparents are also early settlers

My father and Gail's father both worked for Marathon Oil Company. We are very familiar with the history of oil and gas development in the basin and it's contribution to the economy of the region.

I am a petroleum scientist with a Ph. D. degree from the University of Colorado. Gail is a botanist and one of our daughters Loreen is a botanist at the University of Utah. I have been employed by Marathon Oil and Chevron Oil for much of my career

As a family of scientists, we are acutely aware of the need to develop natural resources, such as gas and oil. We are also aware of the critical need to preserve the precious fragile land that is a gift to us from the Creator that has no way to protect itself. In our lifetime we have seen many treasures destroyed, never to recover or be seen again. We have seen fields of bighrss, in colors of blue, pink and white which have totally disappeared from areas of the Absaroka foothills because of intensive overgrazing by sheep and cattle. We have seen total streams diverted from the Big Horn mountain foothills leaving miles of empty storm beds and rare flora and fauna disappear from the region.

I am writing this letter to comment on the recently released draft of the Management plan for the Grass Creek Resource Area encompassing the southwest quarter of the Big Horn basin. I sincerely hope changes will be made to the plan, because much of the land is so fragile and without significant restrictions irreparable damage will occur. Here are my recommendations:

1) The plan needs to provide much more definite goals to address the issue of over grazing and to put together a precise time line and strategy to accomplish them.
2) Additional areas must be added to the BLM's Wilderness proposal. The so called Conservationists Alternative outline these areas
3) Based on a careful risk versus reward studies, I feel that Red Canyon Creek special recreation management area(SRMA) should be protected from further oil development and also the Big Horn River area
4) The Absaroka foothills and the Badlands SRMA must also be protected from

129.2

development for gas and oil.

5) The badlands SMRA should also be designated as an additional Area of Critical Environmental Concern (ACEC) because of extremely fragile soils and spectacular scenic value.

Please consider our request. In this world of global issues this little spot on the globe is important. How can we expect the natives of the Amazon region to say no to special interests and save the rain forests, if we don't have the courage to say no to our special interests here in the U.S. Gail and I and Loreen, join our voices together in hopes we will be heard. We say to you:

Please protect and nurture this land of ours,
Not owned by one, but owned by all,
That generations yet unborn, will praise,
Your vision, your wisdom and your courage!

Sincerely yours,

Lee

Lee Allphin
[redacted]

RECEIVED
MAR 27 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

130

March 12, 1995

Mr. Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross,

I bet you don't get many letters from Chicago about the Grass Creek Resource Area, but since I left Wyoming two years ago I try to stay on top of what's going on, and I hope to be able to move back once I finish school. I had the chance to work with some BLM folks over the Cumberland allotment a few summers ago, and I know you all are trying to do the best job you can.

I am concerned about the management plan for the Grass Creek Resource Area. I think that too many concessions are made to oil and gas development, and that the management of the ACECs is not tough enough.

A better plan would

* protect the Absaroka Foothills, Bighorn River, and Red Canyon Creek Special Recreation Management Areas from oil and gas development.

* designate the Badlands SRMA as an ACEC because of its fragile soils and the excellent scenery. The belt of badlands in this area is as nice as any I've seen, and it shouldn't be trashed.

* protect the areas listed in the Conservationists' Alternative to the BLM's Wilderness Study Areas

I also think more needs to be done about overgrazing in the resource area. I worked on a ranch before I came back east to go to school, and I am no enemy of ranchers, but in such dry areas too many cattle will trash the land, especially the riparian zones. Reducing grazing limits from the proper limits to the number of AUMs now grazed may anger the ranchers, but it doesn't really do anything to protect the land. The resource area needs real reductions for grazing, and more aggressive management to protect the most sensitive areas.

Thank you for your efforts to protect the Bighorn Basin.

Sincerely,

Robert Mahnke

RECEIVED
MAR 28 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

131

March 24, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross;

I am writing to state my concerns about your recently released draft management plan for the Grass Creek Resource Area; if implemented it will permit virtually uncontrolled oil and gas development in this very beautiful part of your state.

I would like to make the following recommendations; specifically:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should ALL be protected from oil development;

The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils;

That all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal be protected, including lands outside the Wilderness Study Areas, and;

More definite goals to address the problems of overgrazing in the resource area be provided, along with a timeline to accomplish those goals in the next five years.

I hope you will take the time to consider each of these recommendations. I appreciate you taking the time to read this.

Sincerely,

Mike Echols

Mike Echols

132

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-0263

[Same as Letter #1]

...

Additional comments:

It is now time to back off. take a deep breath. think a little, read the constitution of our country & state. Then use some common sence.

Name: /s/ Robert Redland ROBERT REDLAND
Mailing address: xxxxxx
City,State & ZIP: xxxxxxxxxxxxxxxxxxxx

Signed: /s/ Robert Redland Date: 3-24-95

RECEIVED
MAR 28 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

133

February 2, 1995

Bob Ross, Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross,

Thank you for providing us with a copy of the Grass Creek Resource Area Resource Management Plan/Draft Environmental Impact Statement. It is a rare to find a government document so superbly edited, and easy to understand. Each member of the team obviously put a good deal of thought into their sections, and we very much appreciate their hard work. We have comments on only four sections:

I. CULTURAL AND PALEONTOLOGICAL RESOURCES

1. Page 107. Please mention in the Paleontology section that the Willwood Formation in the Big Horn Basin is home to the oldest primates in the world. Cantius and Notharctus are unique to our area. For the sake of the public, they should be noted in the document.

   a. An interpretive pull-out and sign on the highway, or along Gooseberry Creek Road at the edge of the Willwood Formation would be a small cost and provide extremely important scientific information to the public. Please consider this.

2. Please see III. 2. below.

II. WILDLIFE

1. Pages 143, 147 and Map 31. The Red Canyon Allotment Management Plan specified that the allotment contains raptor nesting areas, and crucial winter habitat for mule deer and antelope. None of these are mentioned in the Wildlife sections or on the relevant maps. Have these areas been reclassified? If so, we believe it was done in error. During the very hard winter of 1992-93 two to three feet of snow lay in the flats on Red Canyon Ranch from November through the end of March. Over one hundred antelope relied on the crucial winter range in T42 R95, sections 5 and 6; T43 R95 sections 31 and 32; and T43 R96 section 36.

   That same winter we noted that at least fifty mule deer used the crucial winter range in Red Canyon and the surrounding highlands where the wind blew the snow clear. This range includes portions of T42 R95 sections 4, 8, 17,

18, 19, 20; and T42 R96 sections 13, 14, 23, 24. Because of the multitude of side-canyons and draws in Red Canyon, the actual number of deer using that crucial winter range may have been two to three times as high as we noted.

2. Each year several pairs of golden eagles, redtailed hawks, great horned owls, prairie falcons and other raptors nest in Red Canyon. We have counted fourteen nests in the vicinity around Nostrum Spring. Four of those nests have been used by the same pairs of raptors for the last three consecutive years. Please mention this extensive nesting area in the document?

III. RECREATION

Pages 52, 118, 122, and Maps 18 and 28.

1. Please clarify the basis for the 1,224 visitor use days listed on page 122?

   In 1990 when the utilization is claimed we do not believe that the Wind River Reservation, Mr. Jones, or Mr. Weese authorized such trespass. If people did not cross any of these property owners' holdings, how did they get into Red Canyon?

   Please note that in the three years that we have owned Red Canyon Ranch we have seen no one using Red Canyon for recreational purposes, which makes it hard for us to believe the heavy use implied by the listed 1,224 visitor use days. Where does this figure come from?

2. Upper Red Canyon contains an unrecorded archeological district which is potentially eligible for the National Register of Historic Places. The district consists of dozens of rockshelter sites, lithic scatters demonstrating long distance trade, historic inscriptions, one stage station, two stage/freight roads, prehistoric and historic burials, campsites dating from the Paleo Indian period straight through to the proto-historic (one of which contains ceramics), and at least two historic homestead sites.

   This district is so extensive and so rare we do not believe there is any way to mitigate the impacts which recreational usage will cause. Because of the very abundance of archeology, vandalism will occur, no matter how much public education is done. These sites, particularly the rockshelter sites, are very fragile and have the potential to significantly increase our knowledge of past lifeways on local, state and national levels.

3. In addition, Red Canyon, as noted above, is crucial winter range for mule deer, and is extensively used by raptors as a nesting area. The high number of proposed "visitor use days" listed on page 122 is certain to adversely impact the wildlife, even if usage is seasonally limited.

4. Map 28 lists Red Canyon and the surrounding area as "Semiprimitive Motorized." However, there are BLM signs posted along the south side of the canyon which state that motorized vehicles are prohibited. As a result of these signs, all grazing allotment work done in Red Canyon Ranch's Slope Pasture has been conducted on horseback. Has the designation for that area changed? Let us clarify that while ranch work on horseback is obviously more labor intensive, we recommend that that area remain "non-motorized." For the reasons noted in 1, 2, and 3 above.

   In conclusion, the proposed trailheads, trails and primitive recreational usage of Red Canyon will adversely impact raptor nesting areas, crucial winter range for mule deer, and cultural resources. How do you plan to mitigate these impacts?

IV. GRAZING

1. Since Mr. Vessels says that the "Preferred Alternative" describes existing management, are we to assume that it has always been the Resource Area's intention to achieve "a 25% reduction in total authorized grazing," as specified on page 177? Or is this figure in error? If so, please restate the Resource Area's intention.

2. After attending two public meetings concerning this RMP we know that the Resource Area did not intend Table 3-5 in Appendix 3 to be used as a management tool--but surely you realize by now that it can and will be.

   It is easy to envision a situation where enemies of grazing will take this table and say, "The BLM's own statistics demonstrate that allotment 00572 is being utilized at 140% capacity. Obviously the AUMs on this allotment must be reduced by 40%." Those groups will not care that 00572 is an "M" class allotment which is in excellent condition. They will care only that the statistic "prove" the area is being overgrazed.

   Table 3-5 clearly implies management objectives--whether intended or not. Please eliminate this entire table from the final document. It is misleading and potentially devestating to Wyoming's livestock industry.

   Not only that, if such cuts were forced through lawsuits brought by environmental groups, it would undermine proper

   utilization of the public range by reducing BLM's management options.

3. In the event that you opt not to delete this table, please answer the following questions:

   a. What is the source of the figures in the "Suitable AUMs" category? And please do not just site another document. Clarify the scientific criteria upon which these numbers are based. Now were they arrived at? You have admitted that these criteria come from a 1982 study, which means they do not reflect improvements made, or changes in grazing practices implemented by landowners over the past thirteen years. Please justify how these out-of-date "suitability" criteria can be applied to today's allotment conditions?

   b. Please quantify the economic loss (the dollar amount) which each country will suffer as a result of this decision?

   We would appreciate it if you could specifically address the following issues in your economic evaluation.

   (1) A 34% reduction in AUMs will reduce the value of property within Hot Springs and Washakie counties by a corresponding amount, which means a drastically lower tax base to fund schools, fire, sheriff, and other tax-based institutions. Please quantify the anticipated losses for each tax-based element of the affected communities?

   (2) As well, the impact to local businesses caused by a more than one-third drop in ranching income will have repercussions in every sector. Please quantify the losses for each sector, such as service industries which include restaurants and motels, manufacturing, tourism, etc.

   (3) Please address the socio-cultural impacts, particularly demographic dislocation. How many ranching and other small business operations may be anticipated to fail and require the previous owners to relocate to other communities to find work?

   Based upon the proposed failure rates of small businesses, please give a general description of the cultural changes which might be expected in those communities? If lands are no longer viable as ranching operations, should communities in Hot Springs and Washakie counties expect those lands to be purchased by outside interests? Be subdivided? Be left unutilized because of economic inviability?

   Should those communities expect bank failures?

4. Please delineate, by range site, what constitutes "good" condition? We believe it is important to clarify this in the Draft EIS, so that misunderstandings regarding "suitability" might be avoided.

5. You suggest on P. 190 that 8,910 AUMs will be added to grazing allotments in the Resource Area as a result of good management. We believe the criteria used to determine how these AUMs will be awarded should be stated in the document, so that lessees know the "rules" and can document that they have met BLM's goals and merit those additional AUMs.

Once again, we appreciate having the opportunity to comment on this document. If we can be of further assistance, or clarify any of our questions, please let us know. Thank you for taking the time to address our concerns.

Sincerely,

W. Michael Gear and Kathleen O'Neal Gear
Red Canyon Ranch
[redacted]

cc: Governor Jim Geringer
Senator Alan Simpson
Congresswoman Barbara Cubin
Senator Craig Thomas
Dick Lopez, Wyoming Stock Board

RECEIVED
MAR 29 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

134

Stephen Joel Coons
[redacted]

March 26, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am truly concerned about the Bureau of Land Management's draft management plan for the Grass Creek Resource Area. Although I have never visited that part of Wyoming, I plan to some day and do not want to see that the beauty of the land has been compromised or destroyed by oil and gas development. Therefore, I am requesting that the BLM reconsider the plan and incorporate much more stringent protection of the area. Specifically, I am asking for the following changes in the management plan:

- Protect the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas from oil development.
- Also designate the Badlands SRMA as Area of Critical Environmental Concern.
- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas.
- Provide more definite goals to address the overgrazing problems in the resource area.

I am a resident of Arizona, another state that has spectacularly beautiful natural resources ranging from arid deserts to lush mountain forests. The preservation of this type of national treasure is a much more valuable investment than the short-term gain produced by oil and gas development or cattle grazing. Please take steps to change the current direction of the management plan for the Grass Creek Resource Area.

Sincerely,

Stephen Joel Coons

135

Kathleen M. Conner
xxxxxxxxxxxxxx
xxxxxxxxxxxxx

March 27, 1995

Mr. Bob Ross
Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to you as a concerned citizen who very much loves the natural world and all its wildlife. I am deeply concerned about the destruction of our environmental that is taking place everywhere at an alarming rate in favor of economic exploitation. Therefore, I am asking you to please take an active role in safeguarding our fragile ecosystem. I request that the following changes in your management plan be implemented:

1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

2) The Badlands SRMA should also be designated as Area of Critical Environmental Concern because of its spectacular scenic and extremely fragile soils.

[pg 2]

3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for supporting these goals.

Sincerely,

/s/ Kathleen M. Conner
Sierra Club Member

RECEIVED
MAR 29 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

136

Betty Peek
[redacted]

March 26, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming, 82401

Dear Mr. Ross:

Commending the Bureau of Land Management's Bighorn Basin Plan in Wyoming, I respectfully ask that the following changes be made in it:

The Absaroka Foothills Badlands, Bighorn River, and Red Canyon Creek Special Recreation Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an Area of Critical Environmental Concern (ACEC) because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

Thank you for your attention.

Sincerely yours,

Betty Peek

137

Bob Ross, Team Leader
P.O. Box 119
Worland, Wyo. 82401-0119

In reference to the proposed Resource Management Plan (rmp) for the Grass Creek Resource Area. I'm sending this letter to you and hope that you will forward to your local BLM office.

I have reviewed the alternatives and if I had to pick one that would do the less amount of damage to the citizens of Wyo. it would be alternative B. Although this would have a negative impact on timber sale and grazing it would the lesser impact on oil and gas industry and this would protect the states tax base that is received from Oil & gas. Has the BLM completed a study to find out what financial impact this will have on the state?

Why is there a need to restrict grazing, oil and gas, timber sales, and recreational use? What studies have been completed and compiled to justify your restrictions. Why are you restriction all public land users instead of dealing with the apparent cases on an individual basis. The customs, culture and the livelihood of the citizens of the state of Wyoming need to be protected and this is not in support of that. We The BLM's lack of understanding of the complex inter-sat of local communities is sad. It take all of the citizens in recreation, oil and gas, timbering and grazing to make small

[pg 2]

Communities thrive. Why doesn't the BLM ask for help from the communities when preparing such alternatives, that would enhance the community rather the destroy or degrade it?

My personel belief is you need to go back to the drawing board. Ask for help from the local--come up with a plan that would be beneficial to the community and multiple possible and users!

/s/ Debbie Meeks
V.P. Upper Green River Valley
Charter Membership of the
People For the West.
Sublette County Citizens
Box 763
Big Piney, Wyo
83113

Please send additional information that the PFW of Big Piney could help with!

RECEIVED
MAR 2 9 1995
Bob Ross
Bureau of Land Management
[redacted]

138

24-Mar-1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross;

I am writing you regarding the planned allocation of 100% of the Grass Creek Resource area to oil and gas development. I would urge you to consider other alternatives, specifically:

- The following unique and special areas should be protected from oil and gas development: Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Area.
- The designation of "Areas of Critical Environmental Concern" should be given to the Badlands Special Recreation Management Area. This is due to the special value of scenery, extremely fragile soil types, and the special nature of this area.
- Clear and well-defined goals are needed to address the problem of overgrazing in the entire resource area. In addition, a budget and time frame need to be associated to achieve the resolution of this problem.
- All lands included in the *Conservationists' Alternative* to the BLM's Wilderness Proposal need to be protected. This includes lands outside of the Wilderness Study Area.

I hope that you value and incorporate these strong recommendations.

Sincerely,

Don Hauck

139

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:
It is a sad commentary that people like myself must fight against the people who are supposed to be representing us in land management. I am not in favor of our public lands being run by ranchers or industry, but I certainly oppose the oppressive nature that the BLM has shown toward everyone who lives in the west, wake-up and get real, or you will be replaced.

Name: David O. Bayert
Mailing address: xxxxxxxxx
City,State, ZIP: xxxxxxxxxxxxxxxx

Signed: /s/David O. Bayert Date: 3-27-95

140

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063 (307) 765-2244

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Cathy O. Bayert
Mailing address: Box 954
City, State & ZIP: Boxin, WY 82410

Signed: Cathy Bayert Date: 3-27/95

141

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wy. 82401

Dear Mr. Ross,

In the past, there have been time when I have been encouraged by the stand that the BLM has taken in managing land use, but the draft management plan for the Grass Creek Resource Area is certainly not one of them. Please don't implement this plan.

Protect the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek SRMA from oil development and designate the Badlands SRMA as ACEC. This whole area is so unbelievably beautiful and you should know from past experience what happens to the land from the oil, timber and ranch industries.————Total devastation!

Please take time to really see what these proposals might lead to and plan for our future generations. I am 72 years old and during my lifetime I've seen greedy people do irrevocable damage to this planet. It's not to late to save what is left. I want this for my grandchildren and my great grandchildren and for every one elses. Thank you!

Sincerely,

/s/ Sara H. Haubert
xxxxxxxxxxxx
xxxxxxxxxxxxxxxx

3/27/95

RECEIVED
MAR 29 1995
BUREAU OF LAND MANAGEMENT

142

Dennis J. and Barbara Lynn Brabec
[redacted]

March 21, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
World District
P. O. Box 119
Worland, Wyoming

RE: *Grass Creek Area Comments*

Dear Mr. Ross;

We have received and reviewed the proposed *Grass Creek Resource Area, Resource Management Plan, Draft Environmental Impact Statement*. We were raised in the general area and we have had a permit for grazing on the Fifteen Mile Allotment since 1965. The permit has been held by Lynn's family, however, since 1935, first in the name of J. M. Andrews (Lynn's Grandfather) and in 1952 an allotment was issued to M Diamond Sheep Company (Floyd and Ruth Kleinschmidt, Lynn's parents). These allotments were combined and attached to the Ten Mile Farms in the Ruth Kleinschmidt Trust and then purchased by us in 1985. We are familiar with the erratic weather; the generally arid conditions that exist; and the requirement for good range management to maintain or improve the range conditions in the area. We are also familiar with the value of the archeology, wildlife, and mineral resources.

The area has been multiple use. Surrounding communities have derived benefits from livestock production, minerals development, wildlife benefits, limited timbering activities, and limited recreational use. "The principles of ecosystem management, used in BLM's day-to-day management of the public lands and resource, include the recognition that people and their social and economic needs are an integral part of ecological systems." The area is unique and has maintained its uniqueness over the many years even to the extent to suggest some areas need to be "preserved" for future generations. To make extensive changes in the current use of the lands will change the uniqueness of the area. However, some aspects of the management need to be addressed due to the continual change in use observed in the

GRASS CREEK AREA COMMENTS
PAGE NO. 2

142.2

area. Sensitive lands and resources need protection to retain the unique resources and biological diversity.

1) ***Cultural, Paleontological & Natural History Resources:*** These resources need protection for future study and observation, however the proposal to expand the opportunities for scientific and educational uses will actually provide less protection than afforded in the past by making these areas more accessible to more people.

2) ***Land use or resource:*** Those lands that can be used for agricultural purposes (farming) should be sold and put into production. These are minor acres, adjacent to private lands with far less value as "BLM administered lands".

3) ***Livestock grazing management:*** From the numbers given in the draft EIS, the livestock industry has been responsible in keeping the grazing numbers to meet the forage production with less AMU's in periods of lower production and more AMU's used in years of more moisture and more forage production. Areas of concern, including areas of high erosion or excessive use, will require protection by fencing to exclude the livestock, however the cost to build and maintain these structures was not addressed and I assume it will be the responsibility of the permittee. Decreasing livestock numbers to provide forage for wild horses is not an answer; the numbers of wild horses on the range need to be addressed by keeping herd sizes at the current levels. Expanding the herd area will also effect other resource uses and will have additional stipulations for grazing and mineral extraction imposed. The timing of grazing use and the numbers of AMU's will require some adjustments by <u>all</u> permittees. Modification of permits for sheep or cattle use and adjustments in AUM numbers must be applied to <u>all</u> permittees with adjustments substantiated with scientific evidence from studies conducted in the resource area.

3) ***Locatable Minerals:*** The mineral resources have been of significant value to the area and Wyoming by supplying revenue through taxes and royalty and providing jobs and supporting the local economy. Protection of other resources can be achieved by the use of directional drilling in areas of no or limited surface occupancy. Development of the mineral resources and especially the natural gas resources is necessary to sustain the economy of the area.

GRASS CREEK AREA COMMENTS
PAGE NO. 3

142.3

4) ***Recreational Management:*** Extensive development of potential recreational sites is proposed, however the present use of the sites was not defined and the potential benefit of development was not projected. The question of who is to pay for the development and maintenance of the proposed sites was not addressed. The cost/benefit of the proposed developments were not addressed.

The Preferred Alternative is a movement from the current use of the area to more recreational, however the increased use by recreationists is questionable. The significant costs to be incurred in the preparation of the area for more recreational use is not adequately supported. Timbering, grazing and mineral extraction all pay for their use of the lands and provide a significant benefit to the local communities. The limited use and excessive cost to increase recreational use above that now observed in the area is not justifiable and will have very limited benefit to the surrounding communities.

Protection of the resources in the Grass Creek Resource Area is of great importance to everyone. Prevention of excessive erosion will provide the ranching community future use of the lands by prudent application of acceptable measures today. Mineral development can be accomplished without detrimental harm caused to the areas by prudent application of technology as required in the NEPA process. Recreation has been an important resource in the area and has been enjoyed with the current activities using the other resources, however the minimal increase in recreational use and no increase in funding provided by the recreationists, does not justify the additional expenditure for this activity. Attempting to expand the recreational resource at the expense of the other resources is not justified.

Alternative "B" proposed in the Draft EIS seems to most nearly address these concerns we have outlined above. This proposal will provide for the protection of sensitive areas, yet allow development and use of the other resources. Recreation as currently used in the areas will continue and will have additional development. Future development of the recreational aspects can be made if and when the demand occurs. Grazing would be allowed to continue with a reduction in the AMU's and adjustments in times of grazing and protection of sensitive areas to enhance the forage production The changes propose by Alternative "B" would have the least impact on the customs and culture of the area

GRASS CREEK AREA COMMENTS
PAGE NO. 4

142.4

yet achieve the necessary modifications for protection of all resources and allow the continuation of the multiple use of the area.

Sincerely,

Dennis J. Brabec
Lynn Brabec

Dennis and Lynn Brabec

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT

143

[redacted]

March 26, 1995

Dear Mr. Bob Ross,

I believe that the Draft Management Plan for the Grass Creek Resource Area needs revising badly. Please incorporate the following changes into the draft plan:

- The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) must be protected from gas and oil development.
- The Badlands SRMA should also be designated as an ACEA because of its spectacular scenery and fragile soils.
- Protect all areas included in the Conservationist's Alternative to the BLM's Wilderness Proposal, including lands outside of Wilderness Study Areas.
- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a time line to accomplish the goals in the next five years.

I believe that with these changes, you will have a good plan for the Grass Creek Resource Area.

Cordially,

Robert Markiloff

144

Dear Mr. Ross,

I comment as follows, on the draft management plan for the Grass Creek Resource area:

1) 100% of the areas should NOT be leased for oil & gas development.
2) The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek SRMAs' should be protected from oil development.
3) The Badlands SRMA should also be designated an Area of Critical Bovir. Concern because of its spectacular beauty & extremely fragile soils.
4) Protect all areas included in the Conservationists' alternative to the BLM's wilderness proposal including lands outside the Wilderness Study Areas.
5) Provide more definite goals to address overgrazing in the resource area & a timeline to accomplish these goals in the next 5 years.

Thank you,
/s/ Eleanor MacLellan
xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxx

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT

145

March 28, 1995

Mr. Bob Ross
BLM Team Leader
Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to ask you consideration for the following with regard to the Grass Creek Resourcearea Management Plan:

1. Withdraw the Absaroka Foothills, Badlands Red Canyon Creek and Bighorn Special Recreation Management Areas, and the proposed Meeteetse Draw, Upper Owl Creek and Fifteenmile ACECs from all oil and gas leasing due to the sensitive nature of these areas and the inadequacy of proposed stipulations;

2. Improve range condition to encourage ecosystem health and biodiversity by incorporating time limitations;

3. Limit off-road vehicle use to existing roads and trails as proposed, prohibit their use in roadless areas, ACECs and WSAs. Strictly enforce these limits.

Damage done to this area is not easily undone, and would be decades, if not centuries, in the undoing. I urge you not to cave in to temporary political sentiments, but to take the long picture with thought for future generations and to the health of the entire ecosystem.

Sincerely,

Mary V. Chamberlin

[redacted]

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT

146

[redacted]

Bureau of Land Management

Dear Sirs,

I have recently been told of your plans to lease an area named Bighorn Basin for oil and gas development. I have deep reservations about the removal of this, our land. A single bleach spot on your dress is cause for dismissal, discard, perhaps it will be bought secondhand.

I would ask the plan be looked at again with changes such as designating the Badlands Special Recreation Management Areas with ACEC status, providing protection for the Absaroka Foothills, Bighorn River, and Red Canyon Creek SRMA's from oil and other development. Reread the Conservationists' Alternative to BLM's Wilderness Proposal and protect these lands as well as lands outside Wilderness Study Areas. Finally, set definite goals to address overgrazing problems in resource areas in the next few years.

Please, lets get this done cleanly and have it last for some time regardless of decision. Please, don't cave in because of big money. I have never been to these areas but hope to enjoy them all in time. Poor men can still walk and buy bullets, parking garages make people dizzy, and the earth has enough pavement in the air, don't you agree?

Sincerely,

David S. Crimea

[redacted]

147

Bob Ross, Team Leader,
Bureau of Land Management,
Worland, Wyoming

xxxxxxxxxxxxxxxx
xxxxxxxxxxxxx
xxxxx

March 27, 1995

Dear Sir:

Concerning the Grass Creek Resource Area of the Bighorn Basin, please consider the following changes in the management plan. These changes have already been studied by other, I also feel that these changes are essential to keep on of the most beautiful location of Wyoming from severe damage.

1. Protection from oil development is needed in the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas.
2. The fragile soils and outstanding scenic qualities of the Badlands SRMA should also be designated an ACEC.
3. All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas need protection.
4. More definite goals to be accomplished in the next five years are needed to address the problems of overgrazing in the resource area.

Wyoming has long been my favorite State in the Rock Mountain West. Its' scenery (along with Glacier National Park in Montana) is the very finest scenery to be found anywhere.

Sincerely,
/s/ Walter Rivers

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

148

26 March 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Mr Ross,

In response to your recently released draft management plan for the Grass Creek Resource Area, I ask you to make the following changes

* The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

* The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils

* Protect all areas included in the Conservationists Alternative to the BLM's Wilderness Proposal including lands outside the WSA's

* Provide more definite goals to address the problems of overgrazing in the resource area and provide a timeline to accomplish those goals in the next five years

Thank You,
Lee Certain
Lee Certain
[redacted]

147

Bob Ross, Team Leader,
Bureau of Land Management,
Worland, Wyoming

xxxxxxxxxxxxxxxx
xxxxxxxxxxxxx
xxxxx

March 27, 1995

Dear Sir:

Concerning the Grass Creek Resource Area of the Bighorn Basin, please consider the following changes in the management plan. These changes have already been studied by other, I also feel that these changes are essential to keep on of the most beautiful location of Wyoming from severe damage.

1. Protection from oil development is needed in the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas.
2. The fragile soils and outstanding scenic qualities of the Badlands SRMA should also be designated an ACEC.
3. All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas need protection.
4. More definite goals to be accomplished in the next five years are needed to address the problems of overgrazing in the resource area.

Wyoming has long been my favorite State in the Rock Mountain West. Its' scenery (along with Glacier National Park in Montana) is the very finest scenery to be found anywhere.

Sincerely,
/s/ Walter Rivers

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

148

26 March 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Mr Ross,

In response to your recently released draft management plan for the Grass Creek Resource Area, I ask you to make the following changes

* The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

* The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils

* Protect all areas included in the Conservationists Alternative to the BLM's Wilderness Proposal including lands outside the WSA's

* Provide more definite goals to address the problems of overgrazing in the resource area and provide a timeline to accomplish those goals in the next five years

Thank You,
Lee Certain
Lee Certain
[redacted]

149

Dear Mr. Ross

Please don't destroy are wildlands! I am specifically writing about permitting the oil and gas development in the Grass Creek Resource Area. The area is historical and scenic land, which includes the Absaroka Mountains and part of the badlands. also, many animal need that area first to survive. Saving our wildlands is so beneficial to all living things including us. A first glance at these areas may not seem like much to some people, but if we look closer we can learn more about ourselves. Area like the Grass Creek area took millions of years to develop into what they are today. Besides, I have been wanting to see the badlands, and definitely people in the next generations would love to seem them also.

Therefore, before you destroy all of the land for a temporary profit, please take another look at it. Because once you developed all over it and sucked up all the oil, you cannot make the land back to the way it was.

Sincerely,
/s/ Julie Serocki
xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

150

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

March 27, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Mr. Ross:

I am writing regarding the BLM draft management plan for the Grass Creek Resource Area. Because of concerns about oil and gas development leasing, I suggest the following changes:

The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Grass Special Recreation Areas should be protected from oil development. The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils.

All the areas included in the Conservationists' Alternative to the BLM Wilderness proposal should be protected, including the lands outside Wilderness Study Areas.

The management plan should provide more definite goals to address the problems of overgrazing in the resource area. The plan should also provide a timeline to accomplish these goals within the next five years.

Thank you.

Sincerely,

Mary Ovrutt

Mary A. Grovitt

[redacted]

151

RECEIVED
MAR 30 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

03/26/95
Richard W. Hoffman
[redacted]

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Bob:

I am writing you because I believe that the Bureau of Land Management's Bighorn Basin Plan which calls for massive oil and gas development must be changed.

I have traveled by automobile throughout this beautiful and fragile area located in Wyoming. In 1981, I drove a rental car over the eastern slopes of the Absaroka Mountains and down into central Wyoming. Then I retraced my route over the same road of my return drive to Cheyenne, Wyoming. The western slopes of the Absaroka Mountains are very arid and this area includes impressive badlands and very scenic spectacular rock formations. The eastern slopes of the same mountain range provide a sharp contrast with their lush green forests and abundant mountain streams and waterfalls.

I also took a 50c ride through the Big Horn River Canyon while traveling from Great Falls, Montana to Casper, Wyoming. This area contains the Pictograph Cave at the Devil's Tooth Mountain. The Sioux defeated General George Armstrong Custer on June 25, 1876. The areas along the Big Horn and Little Big Horn Rivers are grasslands that are periodically flooded by the rivers running through them. The area along the Big Horn River is delicate ecologically and the water quality in these riparian areas must be protected.

The Absaroka Foothills, Badlands, Big Horn River, and Red Canyon Creek Special Recreation Management Areas must be protected from oil and gas development. The Absaroka Badlands Special Recreation Management Area should be designated as an Area of Critical Environmental Concern because of the scenic and very fragile soils. The soils in this arid area are very exposed and very fragile to wind erosion. In an arid desert environment such as this, soil is such more fragile and tend to migrate much more frequently and are heavily impacted by human disturbance.

151.2

(2)

I urge you to protect all areas included in the Conservationists' Alternative to the Bureau of Land Management's Wilderness Proposal including lands outside Wilderness Study Areas. The Bureau of Land Management must set very specific goals to address the problems caused by overgrazing in the resource area and provide a definite timetable to achieve these goals within the next five years.

Thankyou for your attention to my comments and observations.

Sincerely,

Richard W. Hoffman

Richard W. Hoffman

RECEIVED
MAR 31 1995
BLM WY LANDS & RESOURCES

Earth
one chance

152

Alice Tseng
[redacted]
March 27, 95

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

Following my learning of BLM's Bighorn Basin Plan, as an ordinary citizen, I am writing to you to ask you for the following changes in the management plan:

(1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

(2) The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragil soils.

(3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

(4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

If BLM's current plan was implemented it would permit virtually uncontrolled oil and gas development in the natural gem of the Bighorn Basin, one of the most beautiful parts of Wyoming! Please don't let that happen, countless generations of humans after us are entitled to enjoy this beautiful parts of Wyoming untouched by human development as it stands now!

Thank you for caring.

RECEIVED
MAR 31 1995
BLM WY LANDS & RESOURCES

Earth
one chance

153

Alice Tseng
[redacted]
March 27, 95

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

Following my learning of BLM's Bighorn Basin Plan, as an ordinary citizen, I am writing to you to ask you for the following changes in the management plan:

(1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

(2) The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragil soils.

(3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

(4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

If BLM's current plan was implemented it would permit virtually uncontrolled oil and gas development in the natural gem of the Bighorn Basin, one of the most beautiful parts of Wyoming! Please don't let that happen, countless generations of humans after us are entitled to enjoy this beautiful parts of Wyoming untouched by human development as it stands now!

Thank you for caring.

154

Mar. 26, 1995

Dear Mr. Ross,

I am writing to express my concern of your management plan of the Grass Creek Resource Area. I understand that your plan would allow complete oil and gas leasing inthe resource are. I used to live in Rock Springs and currently work as an engineer for a major oil company.

I believe that you must inelude exclude significant areas from an proposed leasing. In particular, Absaroka Foothills, Badlands, Bighorn River, and& Red Canyon Creek Special Rec. Mgmt Area should be protected from development. Badlands should be designated an ACEC to give the needed special protection! I support the Conservationists' Alternative to the BLM's Wilderness Proposal and want all the lad in the Alternative Proposal protected.

As a member of the oil industry, I understand the need to develop our oil and gas reserves. I also understand the greater need to protect our unique and precious lands!!!

Yours truly,
/s/ O Lafrantboise

155

3-27-95

Dear Mr. Ross:
Re: Grass Creek Management Area
How can uncontrolled oil & gas developments be Permitted in the Big Horn Basin area? SRMA areas should be protected from oil development. The Badlands SRMA should be considered for Special concern because of scenic views and fragile soil. overgrazing should be addressed with a time-line. Protect all areas inside & outside the Conservationists' Alternative to BLM's Wilderness Proposal.
Please change the current Plan to cover the above suggestions. Thank you.
Sincerely, /s/ Catherine K. Mueller

RECEIVED
MAR 31 1995
BUREAU OF LAND MANAGEMENT

156

Wendy Derain
[redacted]

March 28, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

As a concerned citizen, I am writing this letter in regards to the Bureau of Land Management's recently released management plan for the Grass Creek Resource Area (southwestern quarter of the Bighorn Basin) in Wyoming.

I believe the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

Also, the Badlands Special Recreation Management Area should be designated an Area of Critical Environmental Concern because of its very fragile soils.

I also urge that all areas included in the Conservationists' Alternative to the Bureau of Land Management's Wilderness Proposal, including lands outside Wilderness Study Areas, be protected.

It is necessary that more definite goals addressing the problems of overgrazing in the resource area be provided, including a timeline to accomplish these goals within the next five years.

I sincerely hope these changes to this management plan will be seriously considered in order to preserve this exceptionally beautiful area.

Very sincerely,

Wendy Derain

Wendy Derain

157

March 27, 1995

Bob Ross, Team Leader
B.L.M.

Dear Mr. Ross:

I am very concerned about the massive gas and oil development being planned for the Grass Creek Resource Area. Having travelled through the Absaroka Mountains I am aware of the beauty of this region.

I would like to see the following changes in the plan:

- The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from gas & oil development.
- The Badlands SRMA should also be designated an ACEC because of its fragile soils and spectacular scenery.
- Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study areas.
- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Sincerely,

/s/ Phil Broussard
xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxx

RECEIVED
MAR 31 1995
BUREAU OF LAND MANAGEMENT

158

[redacted]
March 22, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to urge you to make the following changes in the management plan for the Grass Creek Resource Area which comprises the southwestern quarter of the Bighorn Basin.

1. The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.
2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.
3. Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you.

Sincerely,

John Minutaglio/kf

John Minutaglio

JM:kf

RECEIVED
APR 5 1995
BUREAU OF LAND MANAGEMENT

159

GRAVES & ASSOCIATES, LIMITED
INDEPENDENT CONSULTING GEOLOGISTS
822 NORTH FEDERAL BOULEVARD
P. O. BOX 1668
RIVERTON, WYOMING 82501
307-856-7898 FAX 307-856-5608

April 3, 1995

Darrell Barnes, Dist. Mgr.
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

RE: Grass Creek Resource Area Draft.

Dear Mr. Barnes:

I generally agree with the plan use alternative chosen by your office, and believe that sufficient protection to the environment is given. One study area, however, does deserve more attention.

With few exceptions, emphasis should be directed toward mineral development within the area. This, however, can not be done until cursory geologic examinations are completed. As usual, the B.L.M. spends little time on geological evaluations, especially that which pertains to the so-called hard minerals. I am aware of numerous unmentioned mineral concentrations in the Grass Creek area which have development potential. Said development need not effect the environment in any way. As a matter of fact, through use of modern reclamation methods, improvements would be imminent. Laws are presently in place for that result.

Only passive mention is given (see "GRASS CREEK RESOURCE AREA RESOURCE MANAGEMENT PLAN DRAFT ENVIRONMENTAL IMPACT STATEMENT", September, 1994) to the titanium-zircon deposits located near the town of Grass Creek. This consists of large high grade deposits of material which is imported into the United States, dramatically affecting the balance of payments. The deposit is presently known to be economically viable, and will be produced in the near future. Because this will provide many jobs in the area, it is recommended that special attention be given which allows the pursuit of mineral exploitation activities.

Regardless to what the environmental activists may say, Wyoming's future remains with the development of public lands.

PROFESSIONAL GEOLOGIST
WILLIAM H. B. GRAVES
PG-22
WYOMING

Sincerely

William H.B. Graves, Geol.

WG/bg
files

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT

160

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely, Stan Hansen
Master Mechanic - [redacted]

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT

161

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Shannon Ellis
Brian E. Dickson

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT

162

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Dan Lesser

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT

163

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Rich Williams
Greg McClure
Al Durand
Sam Spragg

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

164

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Roger Lovell

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

165

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

166

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Nancy W. Ellis

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

167

March 31, 1995

Darrel Barnes
District Manager
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Barnes:

We attended a meeting March 30 in Lovell, Wyoming. The Grass Creek draft EIS public hearing was on the agenda. We were totally surprised at what we heard; they brought up subjects like cutting back on the grazing permits, expanding the wild horse range, which is not needed, since the horses there are not wild horses but horses that have escaped from ranches over the years. They also discussed cutting back on mining and oil, which takes away money from the schools in Big Horn County. Also, in the proposed land-use plan, there are two different places where provisions are made that if the wolves were to move in to the Grass Creek planning area, all other interests in the area would be out. We strongly feel that we don't need any more wild horse ranges and that we do need to keep our oil, gas, mining and cattle industries alive and well for the benefit of the people of Wyoming. We think the BLM should drop this whole plan and start taking care of what is important to this part of Wyoming, and quit worrying about wolves, wildlife and wild horses. If they are meant to be there, they will take care of themselves with all the Game and Fish laws and protection they already have for endangered species and wild horses.

Sincerely,

Parker Lovell

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

One Earth
one chance

Alice Tseng
[redacted]
March 27, 95

168

Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

Following my learning of BLM's Bighorn Basin Plan, as an ordinary citizen, I am writing to you to ask you for the following changes in the management plan:

(1) The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

(2) The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragil soils.

(3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

(4) Provide more definite goals to address the problems of overgrazing in the resouce area, and provide a timeline to accomplish those goals in the next five years.

If BLM's current plan was implemented it would permit virtually uncontrolled oil and gas development in the natural gem of the Bighorn Basin, one of the most beautiful parts of Wyoming! Please don't let that happen, countless generations of humans after us are entitled to enjoy this beautiful parts of Wyoming untouched by human development as it stands now!

Thank you for caring.

169

xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx
March 28, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Mgmt.
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

Please make the following changes in the management plan for the Grass Creek Resource Area.

Protect this area from oil development which would be uncontrolled and threaten this beautiful part of Wyoming.

The extremely fragile soils warrant an ACEC in the Badlands SRMA.

More definite goals should be provided to address the problems of overgrazing in the resource area --- a timeline for the next 5 years and what should be accomplished should also be provided.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal.

Thank you,

/s/ Lynda Fanning

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

170

March 31,1995

Dear Mr. Ross,

I am extremely disturbed to learn of recent proposals to further develop lands in the Grass Creek Resource Area.

What upsets me most is that the increase of oil and gas leasing will likely destroy what is one of Wyoming's last refuges for quality type desert mule deer hunting, not to mention the hunting for sage grouse, chukar and Hungarian partridge the area provides.

Years ago I could find quality deer hunting in the Flat Top and Powder Rim areas west of Sagge. In the past decade the gas leasing and associated roads have cut up the country to the extent that there simply is no place a deer can go to live long enough to be a trophy.

Because of the developments, I abandoned the Sagge area and discovered the areas around Tatman and Sheep mountains. Now I hear you're planning on doing a number to that country as has been done around Sagge.

Somewhere, somehow, we have to make a stand and say enough is enough. When we lose the wild places we also lose a part of what makes Wyoming special. I feel your proposal to allow oil and gas leasing on all public lands is irresponsible and violates your multiple use concept. Sure, hunting will still be allowed, but if history is any indicator it will only be a shadow of its former self.

Your proposals to support wildlife populations to the "extent possible," or "where appropriate," is hollow and without any resolve on your part to do what's right for the sportsman of this state.

The only proposal you have that makes any sense at all is Alternative C as it allows at least some concrete protection for big game and wildlife habitats. Everything else you've come up with violates the public trust regardless of what our esteemed legislature or congressional delegation would have you believe.

Sincerely,
Al Langdon
[redacted]

171

3/29/95

Hi! A few suggestions
1) Protect The Absaroka Foothills, Badlands, Bighorn River & & Red Canyon Creek SRMA from oil development.
2) The Badlands are great as is - designate an ACEC - to keep them that way!
3) Protect all areas included in the "Conservationist" Alternative including lands outside of Wilderness Study Areas

Thanks

/s/ Penny Hanna
xxxxxxxxxxxxx
xxxxxxxxxxxxxxx

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

172

[redacted]
March 30, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I am writing to ask you to consider some changes to the Bighorn Basin Grass Creek Resource Area management plan.

Please provide for the protection of the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek SRMA from oil development. Also, consider protecting all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Particularly, the Badlands Special Recreation Management Area needs to be designated an ACEC because of its fragile soils and its extraordinary scenic value.

Also, please provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your time and consideration.

Sincerely,

Robert D. Bieda

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

173

Christopher P. Valle-Riestra
[redacted]

March 30, 1995

Bob Ross, team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Re: Grass Creek Resource Area draft management plan

Dear Mr. Ross:

Thank you for the opportunity to comment on the draft management plan for the Grass Creek Resource Area.

Probably the most potentially damaging shortcoming of the draft plan is the omission even to consider making less than all of the resource area available for oil and gas leasing. At a minimum, the following areas should be withdrawn from leasing:

- o The designated Areas of Critical Environmental Concern.
- o The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas.

While I appreciate the proposed designation of three ACECs, please also so designate the Badlands SRMA.

All areas in the Conservationists' Alternative to the agency's wilderness proposal (including lands outside wilderness study areas) should be managed to preserve their primitive and natural values intact.

More specific goals against which actual conditions can be measured should be given to address overgrazing problems. Definite plans should be laid out for accomplishing these goals over a period of not more than five years.

Very truly yours,

Chris Valle-Riestra

CVR

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

174

[redacted]
March 29, 1995

Mr. Bob Ross
Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I urge the following changes in the draft management plan for the Grass Creek Resource Area:

*The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

*The Badlands Special Recreation Management Areas should also be designated an Area of Critical Environment Concern (ACEC) because of its spectacular scenic/and extremely fragile soils.

*Protect all areas included in the Conservationists' Alternative to the Bureau of Land Management's Wilderness proposal, including lands outside Wilderness Study Areas.

*Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

As you know, the Grass Creek Resource Area is located in one of the most beautiful parts of Wyoming. The area includes the eastern slopes of the Absaroka Mountains, and some of the most extensive and impressive badlands in Wyoming, as well as awe-inspiring rock art. In the resource area, one can view the stark contrasts of Wyoming from the arid deserts to lush mountain forests.

If the current plan is implemented, it will permit virtually uncontrolled oil and gas development in this beautiful part of the state of Wyoming, especially since none of the alternatives consider leasing less than 100% of the resource area for oil and gas development, inevitably leading to the destruction of the awe-inspiring rock art, and the beautiful lush mountain forests, rivers and creeks of the Grass Creek Resource Area.

I respectfully request that you inform me as to what steps you intend to take in this matter in order that I may inform the Northern Plains regional office of the Sierra Club in Sheridan, Wyoming, and its Washington, D.C. office.

Most sincerely,

Louis S. Campbell
Member, Sierra Club

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

175

[redacted]
March 29, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

I am writing in regard to the draft management plan for the Grass Creek Resource Area. The draft plan places too much emphasis on oil and gas development, and fails to adequately provide for the conservation of the natural resources of this area. I encourage you to amend this plan to include the following provisions:

the protection of the Absaroka Footlands, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas from oil and gas development

the designation of the Badlands Special Recreation Management Area as an Area of Critical Environmental Concern

the protection of all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including areas outside of Wilderness Study Areas

the provision of more definite goals to address the problems of overgrazing in the resource area and a timeline for accomplishing these goals

We must protect areas of natural beauty from uncontrolled development. I encourage you to amend the draft management plan for the Grass Creek Resource Area to place more emphasis on conservation needs, and to reduce the impact of oil and gas development. I hope that you will include the provisions that I listed above in the final draft of the management plan.

Thank you for considering these matters.

Sincerely,

Alan C. Meier

176

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional comments:
I oppose the Grass Creek land use plan since it does not address the views of local and state citizens. We do not need outsid extreme environmental groups to tell us how to manage the lands.

Name: Don Clucas
Mailing address: xxxxxxxxxxxxxx
City,State & Zip: xxxxxxxxxxxxxxxxxx

Signed: /s/ Don Clucas Date: 3-31-95

177

3-29-95

Dear Mr. Ross,
I am gravely concerned and discontented with the draft management plant for the Grass Creek Resource Area. Opening the entire area for oil and gas develoment is not acceptable. In addition you have not provided definite goals to address overgrazing nor a reasonable timeline to accomplish those goals.
The management in the Areas of Critical Environmental Concern is not sufficiently stringent. The Badlands ought to also get the ACEC designation.
Please consider the Conservationists' Alternative to the BLM's Wilderness Proposal.
Big corporations have had their way with BLm for far to long and at great financial and environmental cost. Please help stop this madness.

Sincerely,
/s/ Mary Katherine Ray
xxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

178

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN AREA

March 22, 1995

Dear Mr. Bob Ross

I have followed the events regarding the BLM's Bighorn Basin Plan. While I am not a resident of the region I visited the area of Grass Creek Resource area. This area is of out standing scenic beauty and needs to managed as an asset to the BLM and the nation as a held., I travel from Yellowstone to Cody to visit the museum there and the Bighorn region is to natural for 100% energy development.

Allowing a 100% development non comprised leasing for oil is excessive in managing position for the entire tract of land. I believe that you need to consider the highly scenic corridors of the Big Horn River, The Absaroka foothills,Red Canyon Creek for special easement consideration and exclude these area from resource development.

I know that Wilderness is a bad word in the BLM rank and file service employees. But the Badlands have a very fragile soil composition and Wilderness can be a cost saving method of dealing a potential erosion and costly long term management issues . Hell save it , button it up stick it in a land bank and develop that will give you return on your investment.

Sincerely
Rich Cimino
[redacted]

179

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN

March 22, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

As a citizen concerned with conservation and as a member of the Sierra Club, I'm concerned about the draft management plan for the Grass Creek Resource Area in the Bighorn Basin. I believe that uncontrolled oil and gas development in this area is unwise at best.

I respectfully request that you consider the following changes:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.

The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

There are many generations of Americans yet unborn. Let us leave something for them.

Sincerely,
Heade Fischer
[redacted]

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

180

[redacted]

Bob Ross, Team Leader
Bureau of Land Management
p.O. Box 119
Worland, Wy 82401

Dear Mr. Ross,

I'm writing today regarding the draft management plan for the Grass Creek Resource Area. From what I understand of the current draft, it will allow oil and gas development over too much of the area, including sensitive habitats and recreation areas. Therefore, I am asking that the following changes be made in the plan:

-keep oil development out of the Absaroka Foothills, Badlands, Big Horn River and Red Canyon Creek Special Recreation Management Areas

-designate the Badlands SRMA an ACEC because of its spectacular scenery

-protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal incl. lands outside WSAs

-more sharply define goals to correct overgrazing and establish a timeline to accomplish these goals within five years.

Thank you for your time and attention.

Sincerely,

Noel Mahunkin

RECEIVED
APR 3 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

181

March 31, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Mr. Ross,

Regarding your request for comments and the Grass Creek Management Plan, I would like to submit the following comments. My comments deal with one theme ...I support environmental protection and the conservation of natural resources in the resource area.

I grew up in Cody. I have spent many days in the Grass Creek Resource Area, whether it was hiking, hunting or just exploring. In the past few years, I have spent time in the area. It is still relatively unspoiled and undisturbed. Wildlife is abundant.

I am disturbed by your agency's plan to allow oil and gas leasing and development on public lands. The Gooseberry Badlands, the East Ridge-Fifteen Creek, Tatman Mountain and other areas should be left as they are.

If oil and gas leasing and development is allowed in these pristine areas, you will abuse your multiple use mandate. Multiple use also includes non-extractive uses like protecting and managing wildlife habitat, maintaining healthy and functioning fisheries, protecting water quality and watersheds, providing opportunities for education and scientific research, recreation, and aesthetic values, and preserving important historic and cultural resources.

Recreation without roads is important, too, and must be maintained. We have enough roads in this part of the state. There are plenty of areas in Wyoming that are wide open to motorized recreation activities. Let's provide for activities like backcountry hunting, fishing, hiking, camping, wildlife watching, sightseeing, nature study and opportunities for quiet time in the outdoors.

Improving riparian habitat areas and rangeland is also a mandate that you face. Riparian habitat is very important in our arid state, and especially in the Grass Creek area. Rangeland in this area is degraded and unhealthy, and I can't see increased oil and gas leasing and development helping that situation. A more aggressive use of coordinated range management techniques, used in conjunction with more controlled grazing practices, would greatly improve conditions in the Grass Creek Resource Area. Our state's Department of Agriculture transfers the success of its coordinated range management program. Take note, BLM.

I support Fifteenmile Creek, Mortenson Draw and Upper Owl Creek ACECs. These areas, however, must be off limits to oil and gas leasing and mineral development. Protect the Fifteenmile Creek watershed area. Also, do not allow oil and gas leasing and mineral development in the South Fork of Owl Creek.

The BLM should place a much greater emphasis on managing fish and wildlife habitat. Using phrases like "to the extent possible" and "where appropriate" when you address wildlife is scary, at best. When oil and gas leasing and development takes place, wildlife ultimately loses. Roads are built and never closed. Forage is diminished. Riparian areas are abused. Look at what is happening in southwest Wyoming. Do we want that in the Grass

181.2

Creek Resource Area? No! Concerning wildlife, anything less than supporting Alternative C is wrong. BLM must meet Wyoming Game and Fish Department wildlife objectives and "allow (s) the expansion of wildlife and fish into high potential habitats." Alternative C provides adequate protection for all big game winter range.

Protect -- don't destroy -- one of the last remaining areas of its kind in Wyoming. Someday, I would like to take my son to a quality area to hike, fish and hunt. If this plan is approved, the area I remember from my youth will be gone. Is that progress? I think not.

Sincerely,

Cody Hoers

[redacted]

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

182

Charlotte Tanner

[redacted]

March 29, 1995

Bob Ross, Team Leader
BLM
PO Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

Please protect the Absaroka Foothills, the Badlands, the Bighorn River, and the Red Canyon Creek Special Recreation Management areas from ALL oil and Gas Development. I live in Alaska and have witnessed what good and ill informed "management" of the land will do. I am not against jobs but I really would like my children to have some places left that aren't covered with grease and asphalt and mudslides and slush and everything else people do to the land.

Thank you

Cordially,

Charlotte Tanner

Charlotte Tanner

Bob Ross
Team Leader
P.O. Box 119
Worland, WY 82401-0119

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

1 Apr 95

183

Dear Bob,

As I've talked to you many time about the Grass Creek Resource Management Plan you already have most of my comments, oral and written. I just want to be on record as having participated in the review process. I'm still reviewing the economic impact material that you sent me. Thanks for your help in providing requested materials.

PAGE 36 2nd paragraph	The current amounts, kinds, and seasons of livestock grazing use would continue to be authorized....
Change	The 1994 amounts, kinds ..... a specific year
MAP 20	Why is the area used for wild horse management going to be increased?
MAP 24	Is the BLM going to get public access to the shaded areas?
PAGE 179 SOCIOECONOMICS GENERAL	How does all lands in planning area increase in impact to local area and BLM administered lands decrease? What is the BLM doing to cause this decrease?
PAGE 180 SOCIOECONOMICS LIVESTOCK GRAZING	If things are going to remain the same (see page 36) how come we lose 3 million dollars. What is the cause of this projected decline in our area and BLM grazing in our area?
PAGE 181 SOCIOECONOMICS RECREATION	What is going to increase the value of recreation on BLM land by 3 million and the local area by 13 million dollars? Is there a program out there? How many tourists does this equate to? Where are they coming from and where are they going to stay?
PAGE 183 WILD HORSES	I don't see anything in the current management plan that indicates the need for 160,000 acres to expand the range. Hence the preferred alternative reflects the current management. I'm even more confused about expanding the range.

Thanks,

Donald L. McCracken, Jr.

184

Robert F. Creech, Jr
xxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxx

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Mr. Ross;

This comment is in regard to BLM's draft management plan for Grass Creek Resource Area. If this plan is implement there will be unrefined oil and gas development. What a shame -- this is certainly one of the most beautiful parts of Wyoming.

I would asked that that [ ] following changes be made in the management plan:

1./ The Badlands SRMA should be designated an ACEC because of its spectacular scenic and extremely [ ] fragile soils.

2./ Protect all areas included in the Conservationists' Alternative to the BLM Wilderness Proposal including lands outside Wilderness Study Areas.

3./ Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

4./ Provide more definite more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Please consider, thank you.

Respectfully,

/s/ Robert F. Creech

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

185

March 26, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

We are writing in regards to the BLM's management plan for the Grass Creek Resource Area. If the current plan is implemented it will permit virtually uncontrolled oil and gas development in this beautiful part of the state.

We would like to you to know that we feel the following changes are imperative in the management plan:

* The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

* The Badlands SRMA should also be designated an ACEC because of its spectacular scenic beauty and extremely fragile soils.

* The plan should protect all areas included in the Conservationists' Alternative to the BLM Wilderness Proposal including lands outside Wilderness Study Areas.

* It should provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

We feel very strongly that this area needs to be protected. There is so little left. Humans' stewardship of the earth has been poor. Please know that we want this management plan changed. Thank you for taking note of our concerns. We hope you will work to change this.

Sincerely,

Terri L. Gerber
David K. Blough

186

Jack Highfill
xxxxxxxxxx
xxxxxxxxxxxxxxx
xxxxx

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, WY. 82401

Re: Management Plan for Grass Creek Resource Area

Dear Sir:

As a Sierra Club member, I have been advised that your draft management plan for this area is woefully inadequate. I'm sure this comes as no surprise to you as whatever you propose is probably woefully inadequate. I have never been to this area of Wyoming so am not the least bit qualified to comment on your management plan.

As I understand it this is quite a large area encompassing a wide variety of terrain including some considered for designation as wilderness. with this in mind, it would seem that at least parts of this area would be inappropriate for oil and gas or other development.

(over)

[page 2]

I have no way of knowing if you and your team actually have any say concerning the stewardship of this area or if your responsibilities consist of merely turning out a management according to prescribed guidlines with a pre-determined outcome. If the latter is the case, then this letter and postage are a waste of time and money.

Hoping against hope that you and your team area group of qualified individuals who are intimately familiar with the area and not beholden to special interest, I must you will recognize the value of lightly or un-developed areas and recomend the appropriate level of future development - None.

We have very few areas left to develope and should guard them closely.

I am not against all utilization or development. I think timber harvesting is fine for the entire Black Hills, needs to be much more selective in the Big Horns. Strip mining is inappropriate in either but is fine in the Powder River BAsin as is oil and gas development.

I hope I have made at least one point in all of this and if so that you will consider it when you submit your final management plan.

Sincerely
/s/ Jack Highfill

I hope to visit this area this summer.

187

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Mr. Bob Ross
Team Leader
BLM
Box 119
Worland, Wyoming
82401

Mr. Ross,

I think the BLM should look at the management plan for the Grass Creek Resource Area again. I know that the managers in your agency can produce a better document with better alternatives for protection of the Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek SRMA's. These areas should clearly be protected from oil and gas development. If you would like to see the negative impacts of oil and gas development, you should get some of your friends from the BLM to take you on a tour of the area between Baggs and Rawlins. The uncontrolled road building and poor site reclamation has permanently destroyed much of this part of the red desert. Badlands areas with their soil conditions are particular vulnerable to this kind of exploration and poor management.

Many of these areas should be protected and would be protected if you would work for the Conservationist's Alternative to your agencie's Wilderness proposal. Until you are able to address this alternative in a more sensible manner, your agency should set these areas aside.

Lastly, your management plan should address clearly the problems of overgrazing in these areas and set definite goals and time tables to alleviate these problems.

Thanks. I realize your agency is working hard, but I would like to see you do a little better before the final plan is put out.

188

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Sierra Club
Harvey Broome Group

105 Evans Lane
Oak Ridge, Tennessee 37830
March 29, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

SUBJECT: OIL DEVELOPMENT IN BIGHORN BASIN

Dear Mr. Ross:

The Harvey Broome Group (HBG) of the Sierra Club currently numbers in excess of a thousand individuals who reside in east Tennessee. In writing to you I am speaking for the HBG, concerning the current plan which would permit virtually uncontrolled oil and gas development in the Grass Creek Resource area.

Many of our group have hiked extensively in Wind Rivers and the Bighorns, and we are well acquainted with the natural beauty of your state. We are also aware of the need to protect many of the lovely and fragile areas from uncontrolled development. We are accordingly aware that a number of important changes be made in the BLM draft management plan, viz.:

1. Restrict the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Recreation Areas from development.

2. The Badlands have extremely fragile soils, and should be included in designated "Areas of Critical Environmental Concern".

3. Areas listed in the "Conservationists' Alternative to BLM's Wilderness Proposal" should be accorded a high degree of protection. Please extend this protection status to recommended areas outside the Wilderness Study Areas.

4. Overgrazing is a problem everywhere in the West. Please give this problem the attention it deserves in the Resource Area.

5. We understand that none of BLM's alternatives consider leasing less than 100 percent of the Resource Area for oil and gas development. Please modify these proposals so as to
retain some degree of control of proposed development.

Thank you for this opportunity to express our concerns.

Sincerely yours,

Ken Warren, Secretary,
Harvey Broome Group
SIERRA CLUB

Environmental Quality, Wilderness Preservation

189

Matthew G. Holden [redacted]

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

3/20/95

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross

I am concerned about the Bureau of Land Management's recently released draft management plan for the Grass Creek Resource Area of the Bighorn Basin. I am vigorously opposed to the plan's allowance for virtually uncontrolled oil and gas development in this beautiful region.

Specifically, I urge you to make the following changes:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Thank you for your attention to this.

Sincerely,

Matthew Holden

190

Dear Sir,

Through the Sierra Club, I recently learned of the Bureau of Land Management's plan for the Grass Creek Resource Area in the southwestern quarter of the Bighorn basin.

What I learned disgusted me. The Grass Creek Resource Area is one of the 'most beautiful areas' of Wyoming, wherein lies the eastern slope of the Absaroka Mountains, impressive badlands, and 'awe-inspiring' rock art.

Your proposal allows for 100% of this gorgeous, priceless area to be leased for oil and gas development. And the 3 Areas of Critical Environmental Concern (ACEC) are severely mismanaged and do almost nothing to protect these beautiful lands.

I insist that the Absaroka foothills, Badlands, Bighorn River, and& Red Canyon Creek Special Recreation Management Areas SRMA be protected from oil development, and that the Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

I call upon you to protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas, and to provide more definite goals to address the problems of overgrazing in the resource area with a timeline requiring you to accomplish these goals in the next 5 years.

Thank you. Sincerely, /s/ Jerry Cassel

191

Mary Ann Holden [redacted]

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

3/28/95

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am concerned about the Bureau of Land Management's recently released draft management plan for the Grass Creek Resource Area of the Bighorn Basin. I am vigorously opposed to the plan's allowance for virtually uncontrolled oil and gas development in this beautiful region.

Specifically, I urge you to make the following changes:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

Thank you for your attention to this.

Sincerely,

Mary Ann Holden

192

[LETTERHEAD]
"BLM'S BIGHORN BASIN PLAN
CALLS FOR MASSIVE OIL AND GAS DEVELOPMENT

The Bureau of Land Management has recently released it draft management plan for the Grass Creek Resource Area which comprises the southwestern quarter of the Bighorn Basin. If the current plan is implemented it will permit virtually uncontrolled oil and gas development in this beautiful part of the state. Your help is needed. It is only with your comments that this plan will be changed.

The Natural Gem of the Bighorn Basin

The Grass Creek Resource Area is located in one of the most beautiful parts of Wyoming. The area includes the eastern slopes of the Absaroka Mountains, and some of the most extensive and impressive badlands in Wyoming, as well as awe-inspiring rock art. In the resource area, one can view the stark contrasts of Wyoming from the arid deserts to lush mountain forests.

The Problem

In its management plan for Grass Creek, the Bureau of Land Management is proposing a laissez faire system of management which allows for 100% of the resource area to be leased for oil and gas development. In fact, none of the alternatives consider leasing less than 100% of the resource area for oil and gas development.

Special area management is also a big problem. Although the plan designated three Areas of Critical Environmental Concern (ACEC), the management in these areas is not sufficiently stringent to better protect the area."

Bob Ross
Bureau of Land Management
Worland, WY

3/28/95

Bob;

Many things "flash" across my desk in the course of a busy day, many of which are hard for me to believe are true at

[page 2]

face value. Such is the enclosed which I have just received from the Sierra club. However, if this notification has any truth to it, then I, as a citizen, must register my complaints and feelings.

Based upon the proven catastrophic history of big business, especially the petroleum industry, we, as a country should go out of our way to protect these areas and not allow further development/exploration - the Bighorn basin area (I know well - I had led backpacking trips there) is too fragile and spectacular an ecosystem to even think of developin. The area should be classified as an ACEC area if not a wilderness area.

I am not a fanatic conservationalist- but rather a concerned citizen and a family physician, one concerned not only with the health of my patients but the health and viability of our entire environment - because this impacts us all! Thank you

/s/ Robert Fritz MD
R. Fritz CO#51881

193

RECEIVED
APR 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]

28 March, 1995

Bob Ross, Team Leader
Bureau of Land Management
PO Box 119
Worland, WY 82401

Dear Mr. Ross:

I am writing to urge certain changes in BLM's Bighorn Basin Plan.

Oil and gas development must be restricted in the Grass Creek Resource Area. The environment here is too special to warrant the threat of such development.

The Badlands SRMA must be designated an ACEC. The fragile nature of the soils demands protection because of this area's unique beauty.

The problems of overgrazing must be addressed with specific goals provided for the next five years.

If we lose our special areas through greed and overdevelopment, even the economy of the nation will suffer. We are witnessing this in the east with our fishing industry decimated by lack of protection and care, causing now untold suffering to those who over-exploited the natural resources.

I urge you to consider these changes.

Sincerely

Judith B. Deterrons

194

Mr. Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, WY 82401

March 29, 1995

Dear Mr. Ross:

I write to you with concern about the management plan for the Grass Creek Resource Area of the Bighorn Basin.

- The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek SRMA must be protected from oil development.
- The Badlands SRMA should be designated an ACEC due to the fragile ecosystem.
- Protect all areas outside Wilderness Study Areas.
- Address overgrazing problems
- Set a timeline for establishing above goals.

Big business & development should not be able to destroy our few remaining ecosystems.

Please respond as soon as you can. Thank you for all your conservation.

Sincerely,

/s/ Kathy Baugh
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

195

March 29, 1995

Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, Wyoming 82401

Dear Sir:

My wife Buka and I are writing about your draft management plan for the Grass Creek Resource Area. We are not at all happy with you plans to not protect their land in any way.

We ask for the following changes:

1) The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.
2) The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.
3) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
4) Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline

(Over please)

[page 2]

to accomplish those goals in the next five years.

Having worked in the oil fields as a roustabout and well puller I know very well the destruction that oil drilling will do to these areas. Please implement the about five points.

Sincerely,
/s/ Tom Denison
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxx

196

GRASS
Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

[Same as Letter #1]

...

Additional Comments:

The people that compiled this document knows nothing of conservation. This is not their land, it is not federal land. It is the people of Wyomings land

Name: David A Bouma
Mailing address: xxxxxxxxxx
City, State & Zip: xxxxxxxxxx

Signed: /s/ David A. Bouma Date: 4/3/95

RECEIVED
APR 5 1995
BUREAU OF LAND MANAGEMENT
BOULDER, WYOMING

197

March 31, 1995

Bureau of Land Management
Bob Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I am writing to voice my concern about the Alternatives listed in the Grass Creek draft EIS. It appears to me that the BLM has come to the conclusion that there is little or no potential for further natural resource development in the Grass Creek area. Therefore, you believe that your proposed additional restrictions on leasing and surface occupation will not have a significant economic impact on the local economy or state revenues.

As could be expected this unilateral and short sighted conclusion is dead wrong. The BLM may not be able to see into the future, but a look at history should provide sufficient insight as to your position. Development of natural resources in the Grass Creek RMP has had a significant positive impact on Wyoming state revenues, the local economy and the quality of life for Wyoming residents for over 100 years. How can the BLM assume that this will not be the case for the next 100 years? The proposed restrictions under preferred Alternative A will do nothing but ensure that it won't!

Oil and gas leasing and production, as well as, grazing have provided nothing but a positive benefit to the Region. Therefore I think that it is an obligation of the BLM to ensure that it has the potential to continue to do so well into the future. In respect to oil and gas leasing, new technologies are continually being developed which provide for new discoveries and enhanced recoveries from existing fields. Please don't be short sighted; one small discovery can add millions of dollars to local, state and federal revenues, and provide a very solid base for economic development.

Based on the above comments, I recommend that the proposed EIS be redrafted with Alternative B being the preferred alternative.

Sincerely,

Jim Fenaman
J.A. Fenaman
[redacted]

RECEIVED
APR 5 1995
BUREAU OF LAND MANAGEMENT
BOULDER, WYOMING

198

Grass Roots Alliance For State Sovereignty
Box 263 Greybull, WY 82426-2063

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Grass Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well . . . If you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Dean - Mary Fletcher
Mailing address: [redacted]
City, State & ZIP: [redacted]

Signed: Mary Fletcher Date: 8-25-95

199

April 3, 1995

Dear Mr. Ross,

I am writing in regards to the Grass Creek Resource Area, a place where I spend quite a bit of time hiking & fishing. I would like to ask that you include in your management plan some effective ways to keep this special place rich in wildlife. I have fears that more mining & oil drilling will have affects on the area that will make it less rich.

I have already noticed the effects of ATV traffic on certain areas & less wildlife in other areas. We need to keep some viable habitat for the fish & animals of the area.

One way would be to make South Fork of the Owl Creek a Wild & Scenic River. Also maybe some way to protect the Fifteen Creek Badlands & the Greybull River.

Please consider in your plan ways for multiple use, but also ways to keep this area wild & provide a home for the many wild creatures that live in Wyoming.

Thank you for your time.

Sincerely,
/s/ Lisa Jaeger

200

RECEIVED
APR 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

John J. Wuminger
[redacted]

Mr. Darrell Barnes
District Manager
Bureau of Land Management
Worland District Office
P. O. Box 119
Worland, Wyoming 82401

RE: Grass Creek Resource Area

Dear Mr. Barnes:

I am a county commissioner from Park County Wyoming, but this testimony is from my perspective, not necessarily that of all Park County Commissioners.

Thank you, for giving me the opportunity to state my views.

I would first like to state my concerns over custom and culture of this area. After the civil war in the 1860's the United States had people who were encouraged to move into the desert areas of the western states to develop the land. These were miners, loggers, and ranchers who were purged individuals who brought a custom and culture to these western areas with the use of their imagination and the unregulated use of the land that no one else wanted. There are museums and artisns who vividly depict the custom and culture of these people, which was created as part of the developing of these vast open ranges. I sincerely hope we do not lose our way of life from the regulations we are bringing to the land in these areas.

As a county commissioner trying to meet operating needs, I have concern over how we are to be reimbursed by the impacts that are written into the plan. The best data available tells us that each AUM directly aide to the economy of the area and we have estimates on the number of AUM's from domestic animals. We also estimate returns from mineral and timber income. An AUM is worth about $22.43 directly to the economy of the area and an additional $44.68 indirectly, making a total of $77.11 per AUM of domestic livestock. How does the area get reimbursed for the mule deer which is, according to University of Wyoming data, .15 AUM, from the elk which is .7 AUM, from the moose which is 1.2 AUM, the antelope which is .12 AUM, white tail deer which is .1 AUM, and the wild horse which is 1.5 AUM. How do you reimburse local economies for recreation use and other free access uses?

Thank you, for your consideration of these concerns.

Sincerely yours,

John J. Wuminger
Park County Commissioner

201

John R. Swanson
xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxx

April 2, 1995

Bureau of Land Management
P O B 119
Worland, Wyoming 82401

Dear Sirs;

Please accept my following comments concerning the Draft Resource Management Plan& Environmental Impact Statement, Grass Creek Resource Area, Wyoming.
The Grass Creek Resource area contains outstanding scenic, wildlife, and wilderness attributes of certain National significance.
As this area features unique, varied, and fragile resources that must be preserved.
I, then, wish to advise that I oppose oil and gas development in this region, as development will destroy soil, water, vegetation, and wildlife assets. And urge that each of the following areas, with acres, be designated as wilderness:
Owl Creek 10,500, Bobcat Draw/ Badlands 35,000,
Sheep Mountain 33,000, and Red Butte 27,000.
With each of the following streams designated as a National Wild and Scenic River:
Bobcat Draw, Fifteen Mile Creek (complex), Grass Creek (complex), and Owl Creek (complex).
To select as Preserves the following areas, with acres:
Fifteenmile Creek Watershed 285,000, Upper Owl Creek Area 19,300, and Meeteetse Draw Rock Art area 9,000.
To preserve the habitats of the Black-Footed Ferret, Bald Eagle, Grizzly Bear, Northern Rock Mountain Gray Wolf, Peregrine Falcon, Wolverine, Lynx, Goshawk, Trumpeter Swan, and Spotted Bat.
To select the following as Sanctuary Areas:
Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek.
To eliminate grazing so as to save soil and vegetation.
To dedicate this Grass Creek Resource area as a National Preserve and Wilderness With the Wilderness to include 631,000 acres,
and No development activities.
To promote biological diversity, ecosystems conservation, Wilderness Preservation, Stream Preservation, and Wildlife, Fish, and plant species preservation.
So as to fully benefit man, and all Life!
Sincerely,
/s/ John R. Swanson.

202

RECEIVED
APR 6 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Brenda Poston-Schoeffer and/or David Schoeffer
[redacted]

31 March 1995

Rob Ross, TeamLeader
Bureau of Land Management
P.O.Box 119
Worland, Wyo 82401

Greetings Bob,

I am writing as One Greatly Concerned Human/Spiritual Being living on a Planet which has been and is being mistreated - in gross depletion of flora and fauna.

In particular I would like to greatly uphold the following:

1-that the Badlands Special Recreation Management Area (SRMA) be designated an ACEC in respect of its spectacular beauty and fragile soils;

2- that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek SRMA be protected from ANY/oil development,

3- that all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including land outside Wilderness Study Areas be PROTECTED'

and 4- that more definite goals to address the PROBLEM OF OVERGRAZING in the resource area, and a timeline to accomplish those goals in the next 4 years, be PROVIDED.

I urge you with rational/emotive fervor and dedication to the protection of all wilderness and other areas of thisPlanet

Brenda Poston-Schoeffer

RECEIVED
APR 6 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

203

GERALD R. BROOKMAN

April 2, 1995

Dear Mr. Ross:

I am writing concerning the draft management plan for the Grass Creek Resource Area. I request that these comments be considered as if they had been presented as oral testimony at a public hearing and used to help make the final decisions on the subject plan.

I would like to urge that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development, or other activity that would be detrimental to their present condition by leading to erosion, stream sedimentation, loss of vegetation and wildlife habitat in any way.

I would like to urge that the Badlands SRMA should be designated as an Area of Critical Environmental Concern because of it's magnificent scenic value and extremely fragile soils.

I urge the complete protection from any type of development of all areas included in the Conservationists' Alternative to the B.L.M.'s Wilderness Proposal, including those lands included in it which are outside the present Wilderness Study Areas.

I strongly urge that your agency make a comprehensive study of, and formulate more definite goals to address, the problem of overgrazing in the Grass Creek Resource Area, and provide a timeline to accomplish those goals as soon as practicable, in no case exceeding five years.

Sincerely,

Gerald R. Brookman

RECEIVED
APR 6 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

204

April 5, 1995

Robert Ross
Bureau of Land Management
Post Office Box 119
Worland, WY 82401

Dear Mr. Ross:

I am writing you in order to comment on the recently-released draft management plan for the Grass Creek Resource Area in Wyoming.

I understand that the plan allows for 100% leasing of this area for oil and gas drilling. This concerns me very much. This beautiful part of Wyoming is an environmentally rich and sensitive area. It should not be completely opened to oil and gas development and should be subject to stricter management of environmentally significant areas.

In particular, I urge the following:

1. The Badlands Special Recreation Management Area is scenically spectacular, and I understand it has extremely fragile soil; therefore, it should be designated as an 'Area of Critical Environmental Concern' (ACEC).

2. Oil and gas drilling activities should not be permitted in the Special Recreation Management Areas: Badlands (redesignated as an ACEC), Absaroka Foothills, Red Canyon Creek, and Bighorn River;

3. All areas included in the so-called "conservationist's alternative" to the BLM wilderness proposal should be protected; and

4. Better control of grazing in the entire resource area should be implemented in the near future in order to deal with the existing problems of overgrazing.

Thank you very much for giving my comments your serious consideration.

Very truly yours,

Gerald R. Schlintz

c: Hon. Dianne Feinstein, United States Senate
Hon. Barbara Boxer, United States Senate
Hon. George Miller, U.S. House of Representatives

205

To Mr. Bob Ross:

Please include the following changes in the management plan for the Grass Creek Resource Area. The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Management Areas should be protected from oil development. The Badlands SRMA should also be designated an ACEC because of its fragile soils and spectacular scenery. Please protect all of the areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas. More definate goals need to be provided to address the problems of overgrazing int he resource area, and a timeline should be set up in order to accomplish these goals.

Corporate short term profits shouldn't be the main consideration in determining how our resources are managed. These resources belong to all of us, not only to the corporations.

Sincerely
/s/ Doug Goodall

Doug Goodall
xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

RECEIVED
APR 1 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

206

JIM GERINGER
GOVERNOR

Public Service Commission

700 W. 21ST STREET
(307) 777-7427
FAX (307) 777-5700
TTY (307) 777-7427
CHEYENNE, WYOMING 82002

STEVE KLEINSCHMIDT
CHAIRMAN
DOUG DOUGHTY
DEPUTY CHAIRMAN
BIL TUCKER
COMMISSIONER

MEMORANDUM

ALEX I. ELIOPULOS
CHIEF COUNSEL AND
COMMISSION SECRETARY
STEPHEN G. GOLLEY
ADMINISTRATOR

TO: MS JULIE HAMILTON
POLICY ANALYST
GOVERNOR'S OFFICE

FROM: JON F. JACQUOT
ENGINEERING SUPERVISOR
PUBLIC SERVICE COMMISSION

DATE: MARCH 24, 1995

RE: BUREAU OF LAND MANAGEMENT GRASS CREEK RESOURCE AREA MANAGEMENT PLAN, STATE IDENTIFIER NO. 95-081(a)

Please forgive the lateness of this response to your request to comment on the referenced matter. The Commission requests that no unreasonable restrictions be placed on the provision of utility service or on the construction of utility and pipeline facilities as a result of the implementation of the proposed plan.

The Commission would prefer that the Bureau of Land Management avoid mandatory undergrounding of electrical utility facilities as a management objective. The cost of constructing, operating and maintaining underground lines is generally higher than the cost of comparable overhead facilities and the reliability is not as good. The Commission's general policy is that those who cause the higher costs of undergrounding electrical lines should pay the difference. If the additional costs are not borne by those who cause them, the ratepayers of the affected utility would be unfairly discriminated against when burdened with paying the additional costs.

The Commission requests that, when mineral leasing is being done, the costs of relocating any utility and pipeline facilities to accommodate mineral production be borne by the lessee. If these costs are not borne by the lessee, those costs would fall unfairly on the ratepayers of the affected utility or pipeline.

206.2

The Commission requests that, in cases involving oil and gas leasing, the Bureau of Land Management not restrict the construction of utility and pipeline facilities necessary for the exploration and production of oil and gas.

The Commission requests that, when the Bureau of Land Management sells or exchanges lands, the rights of the utilities and pipeline operators holding right-of-way easements from the private landowner and right-of-way grants from the Bureau of Land Management be protected. The Commission suggests that the private land owners acquiring Bureau of Land Management lands give new right-of-way easements to the utilities and pipeline operators for their existing facilities, and that, when the Bureau of Land Management acquires private lands, it issue new right-of-way grants to the utilities and pipeline operators for their existing facilities.

Where construction is undertaken, the Bureau of Land Management or those managing the construction should contact and coordinate with the utilities and pipeline operators serving and otherwise present in the area to prevent contact with and damage to utility and pipeline facilities. If it becomes necessary for utility or pipeline facilities to be modified or relocated, the cost of modifying or relocating any utility and pipeline facilities to accommodate construction, should be borne by the Bureau of Land Management or those benefiting from the construction. If not, those costs would fall unfairly on the ratepayers of the affected utility or pipeline.

The Bureau of Land Management should make provisions requiring those with timber operations to contact and coordinate with the utilities and pipeline operators serving or otherwise present in the area to prevent contact with and damage to utility and pipeline facilities. This should also apply to those clearing future right-of-ways. Consideration should also be given to the establishment of utility corridors through timbered areas, with maintenance of cleared areas for construction.

207

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

WASHAKIE COUNTY COMMISSIONERS

Courthouse
P.O. Box 260
WORLAND, WYOMING 82401

Phone (307) 347-6481
Fax Phone (307) 347-6366

WILLIAM "BILL" BLANK, Chairman
ALICE LASS, Member
WILL "JOHNY" DONS, Member
HAROLD COE, Member
STEVE TROMBLEY, Member

April 3, 1995

Darrell Barnes District Manager
Bureau of Land Management
Box 119
Worland, WY 88401

References: Washakie County Commissioners comments on Grass Creek Resource Management Plan

Dear Darrell:

The Washakie County Commissioners would like to thank the local Bureau of Land Management office for extending the comment period and allowing this public hearing on the Draft EIS and proposed Land Use Plan as requested by the four counties involved.

Our comments will be general in nature that we will have entered into the record today. More in-depth concerns identifying specific sections of the draft will be addressed at a later date. The May 7th deadline for commenting is only enough time to study one section of the plan. The Bureau of Land Management has taken four years to produce this document and we requested our first draft in January of 1994. Four months is barely enough time to address all the issues properly.

The law through NEPA and other laws requires federal agencies in the planning process to work closely with local governments at the planning stage. We think the work shop held by Bureau of Land Management, that an invitation to an open house held by the Bureau of Land Management, is the same as sitting together through a planning process as required by law.

Our local economy and reduction of our tax base is at a risk and could cause extreme hardships on our local citizens that are left to pay the tax bill for the services. That tax base can be identified under limiting oil and gas exploration, and production. Timbering into wildlife industry that will be affected. Limited access by recreationists and hunters will also affect our tax base.

A major problem the county faces is the reduction of AUM's by BLM when there has already been an approximate 30% reduction in the last 20 years. Reducing AUM's and creating the wild horse herd range is to us ridiculous and certainly does not support economic benefits for our county. Concerns we have cannot be researched by the May 7th deadline and could take up to two years.

CHEF WASHAKE

207.2

Six years ago the State of Wyoming, in cooperation with the county governments, developed a local Big Basin Master Water Plan. That plan identifies 50,000 acre feet of water still to be used for irrigation purposes on newly developed land in the Big Horn Basin. Fifty thousand acre feet could be doubled under the Interior's Departments new conservation plan. The Big Horn master water plan identifies approximately 60,000 acres of federally controlled land can be put under irrigation when the market can afford the development. The feasibility of developing such lands is getting closer. The lands identified in the master plan are located from Meeteetse to Powell and are within the boundaries of the Grass Creek Resource area. If we can put 30% of the identified lands into production it would be a 15 million dollar economic boost to the four counties here in the Big Horn Basin. I'm talking direct dollars annually. The 30,000 acres proposed to be developed are a very small percentage compared to the 400,000 acres this plan wants to set aside for a critical environmental concern.

No where in the proposed Grass Creek Resource Plan is there reference to any of those lands to be developed for agriculture. These need to be identified and recognized in the plan and if they are not it would be a great economic loss to this county's future.

The glossary should be expanded to include definitions of all terms used in the documents. An index must be added to the document to facilitate analysis. The reference should site scientific publications and authors for all decisions made in the document for which there is disagreement or controversy in the scientific and technical community. Lack of a complete glossary, an index and a complete reference section has made it difficult, if not impossible to analyze the Grass Creek Resource Management Plan.

In place of this management plan perhaps a coordinated resource management plan could be developed.

In closing we as county commissioners are concerned about our customs, culture, and our economic base being eroded.

Sincerely,

William Blank, Chairman
Washakie County Commissioners

Alice Lass, Member

Harold Coe, Member

John Dons, Member

Steve Tromblely, Member

208

4/5/95

Mr. Ross, BLM

I'd like to submit this as commentary on the Grass Creek Mgmt Plan.

1. First I am in favor of taking the long view and preserving what's been left here intact rather than opening it up to all sorts of short term uses which inevitably accrue to the benefit of a few.

2. The idea of multiple use is in fact not served when it allows a particular user to extract for his sole use– or establish huts & roads for a certain groups use or cut timber for the benefit of a few companies.

[page 2]

2. The long term values of non-use, non extraction should be realistically included. There's more long range value in preserving what's left than in using it up & screwing it up the way most of the other states have done.

4. The Wilderness Study Areas should be kept primitive and unroaded. Once the level of protection slips, we can't go backward toward "primiteness" if it is sacrificed. The WSAs should be off-limits to extractive industries. They're too valuable as they are.

5. Management should favor protection of riparian areas (absolutely vital), scenic values, and wildlife. Esp. habitat zones for grizzly bears, elk, moose, bighorn,

[page 3]

pronghorns, and the myriad non-game mammals, birds, etc. These things are worth more than any severance taxes on oil & gas and such.

Again, we need to that the long range, conservation view. Not the short range, selfish, what's-in-it-worth-now approach.

5. In the near future it will become even more obvious that the heroes in BLM are the ones that stand for less use & abuse of the resource and for more careful stewardship.

The beautiful, serene, awesome spaces of the Grass Creek Area and the critters that live there naturally deserve the maximum level of protection.

[illegible]———
/s/ Gene Ball

xxxxxxxx xxxxxxxxxxxxxxxx

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

209

Green Rocks Alliance For State Sovereignty
[redacted]

January 17, 1995

Mr. Bob Ross
BLM RMP Team Leader
Box 119
Worland, WY 82401-0119

Re: Gross Creek Resource Area Draft Land Use Plan

Mr. Bob Ross,

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belong to our state as well. Prudent management of our resources, is sound business practice, and our businesses operate with that in mind now. We have managed the affairs of our state quite well ... if you do not agree with this, look at the eastern states.

This plan does not consider the needs of the citizens or businesses of Wyoming, yet you would impose this on us as if we did not value our public lands. Any restrictions deemed necessary should come from the state of Wyoming.

We oppose this document in its entirety.

Additional comments:

Name: Dr. Robert Walter
Mailing address: [redacted]
City, State & ZIP:
Signed: Robert Walter Date: April 3, 1995

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

210

Kristina Younger
[redacted]

April 3, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

SUBJECT: Comments on Draft Management Plan of the Gross Creek Resource Area (Bighorn Basin)

Dear Mr. Ross:

As a visitor to Bighorn Basin, a mother, and an environmentalist, I have major concerns about the draft Management Plan. It needs to be changed in the following ways:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Area (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated as an Area of Critical Concern (ACEC) because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a time line to accomplish those goals in the next five years.

Thank you for this opportunity to comment. Now change the plan! Create alternatives with less than 100% of the land leased for exploitation!

Sincerely,

Kristina Younger

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

211

[redacted]
April 4, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross,

I am distressed to learn that the draft management plan for the Gross Creek Resource Area will allow 100% of the resource area to be leased for oil and gas development, and would like to request that some areas should be protected from this.

The Absaroka Foothills, Badlands, Bighorn River and Red Canyon Creek Special Recreation Area should be protected, and the Badlands should be an area of Critical Environmental Concern (ACEC) because of its extremely fragile soils and really spectacular scenery. I do believe that all areas protected in the "Conservationists" alternative to the BLM's Wilderness Proposal including land outside WSA's should be protected from oil development.

I would also like you to provide more definite goals to address the problems of overgrazing in the Gross Creek Resource Area, including a time line of definite dates to accomplish those goals in the next five years.

Although I have never visited Wyoming, I have read much about its special beauty, a book by John Gulber being one of the most interesting. I have been in other areas of the West where the magnificent scenery was quite comparable. These experiences have led me to support the suggestions I have made in this letter.

Sincerely,

Mrs. Julie C. Blunt

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

212

Monday, April 3, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross

If the draft management plan for the Gross Creek Resource Area of the Bighorn Basin is implemented as it is now drafted it will allow uncontrolled oil and gas development in one of the most beautiful parts of your state. In this plan the entire area is to be leased for oil and gas development, with none of the alternatives considering less than 100% of the area for development. Three Areas of Critical Environmental Concern are designated in the plan, but the management of these areas is not sufficient to protect the area. The plan should be changed so that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas are protected from oil and gas development and the Badlands Special Recreation Management Area should also be designated an Area of Critical Environmental Concern because of its scenic and very fragile soils. The plan should protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Goals should be provided to address the problems of overgrazing in the resource area and a timeline should be provided for accomplishment of these goals within the next five years.

Yours truly,

Thomas Hopton
[redacted]

213

Ms. Ruth A. Mains
xxxxxxxxxxx
xxxxxxxxxxxxx
xxxxxxxxxxxxx

Dear Bob-- I am writing about your Bighorn Basin Plan.
I would like to see the following changes. 1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development. 2. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils. 3. Protect all areas included in the Conservationists Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. 4. Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Sincerely
/s/ Ruth A. Mains

214

RECEIVED
APR 7 1995
BUREAU OF LAND MANAGEMENT
BIG HORN RESOURCE AREA

Bob Ross, Team Leader
BLM
P.O. box 119
Worland, Wyoming 82401

Dear Mr. Ross,

As you are aware the Grass Creek Resource Area is one of the most beautiful parts of Wyoming that contains the eastern slopes of the Absaroka Mt. and extensive oil and gas development. This, I feel is a big mistake. I ask that the plan be altered to include the following:

a. The Absaroka Foothills, Badlands, Bighorn River and Red Canyon SRMA be protected from oil development.

b. The badlands SRMA be designated an ACEC because of outstanding beauty and fragile soil.

c. Protect areas included in the Conservational Alternative to the BLM Wilderness Proposal including lands outside Wilderness Study Area.

I encourage you to include the above in the management plan. Thank you for your time and consideration in this matter.

Sincerely,
Richard Davis
Richard Davis

215

RECEIVED
APR 10 1995
BUREAU OF LAND MANAGEMENT
BIG HORN RESOURCE AREA

Ronald Hinchman • [redacted]

April 5, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401 - 0119

Hello ——

I've just gotten wind of what's in the BLM draft management plan for the Grass Creek Resource Area. Considering that only a small percentage of the territory is even considered as wilderness study, don't you think, in the name of multiple use, you could leave it as WSA instead of declaring it all to one use - oil and gas? Even if Congress rejects them as designated wilderness, they are still so special that they should be protected. (I'm talking about Owl Creek, Sheep Mountain, Red Butte and the Bobcat Draw area).

If I understand the plan correctly, every inch of the Grass Creek area, including areas of critical environmental concern, sensitive wildlife habitat and undeveloped recreation land is to be opened up to oil and gas leasing. This is patently ridiculous, so extreme as to make me wonder who is pushing you around over there. As I read the "multiple use" law, it extends to other than extractive uses...it talks about protecting water quality and watersheds, protecting wildlife habitat, and providing opportunities for research, recreation and aesthetic values. If you proceed to ignore the law that governs you, you are essentially criminals, and leave yourself open to all kinds of ugly and entangling lights that take up time and taxpayer money. Why not get it right now?

Sincerely ——
Hannah Hinchman

216

I'm writing to oppose the BLM's proposal to Open Wilderness Study Area in the Grass Creek Resource Area to Hard Rock mining, motorized vehicle use & oil & gas development. I used to work in the Grass creek area & am familiar w/ its unique character & features. I urge the BLM to protect this area's potential National natural Landmark and make areas of critical envmtl. concern off limits to oil & gas leasing. The "town" of Grass Creek is an ugly & discouraging example of what happen with oil & gas development. Instead, the BLM should emphasize improving riparian areas & the rangeland so as to increase the areas fish & wildlife habitat - the area has tremendous potential to support wildlife w/ its mozaics of habitats. Managing every acre as available for oil & gas development is short-sighted, damaging & a violation of multiple use. Please protect Grass Cr. Thank you. /s/ Caroline Byrd xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

217

Why is it so difficult for the BLM to manage the land properly?
Where is the policy [illegible] in rather than demdish [sic] and destroy our natural resources?
Right now the Grass Creek Resource Area is under serge by the plan to permit uncontrolled gas & oil development.
We urge you to make the following changes.

1.) Protect the following from oil development
Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek SRMA
2.) Designate the Badlands SRMA as an ACEC
3.) Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Thanks ---------
/s/ M---- Crenshaw [illegible]
/s/ Jack Crenshaw

218

RECEIVED
APR 10 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Mr. Bob Ross
Team Leader
Bureau of Land Management
PO Box 119
Worland, Wyoming 82401

April 2, 1995

Dear Sir:

I am writing to you about my concerns with the draft management plan for the Grass Creek Resource Area.

#1 - Why do all of the alternatives allow 100% of the resource area for oil and gas development?

#2 - I was happy to see three areas set apart as Areas of Critical Environmental Concern. The management proposed for these areas does not seem likely to sufficiently protect them.

#3 - All areas included in the Conservationists' Alternative to the BLM's Wilderness proposal should be protected.

#4 - The Badlands SRMA should also recieve extra protection because of its fragile soils, and the scenic beauty.

#5 - Overgrazing problems need to be solved with a definite time-frame and definite goals.

Thank you for this opportunity to comment.

Sincerely,
Barbara Rislow
Mrs. Barbara Rislow
[redacted]

219

RECEIVED
APR 10 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]
April 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Re: Comments on Grass Creek Resource Area Draft Management Plan

Dear Mr. Ross,

I wish to submit the following comments on the Grass Creek Resource Area Draft Management Plan. The area in question is extremely scenic and the range of terrain and vegetation zones that it includes makes it of high value for the diversity of habitat and visual resources.

Overall, the draft management plan appears to abdicate any effort to protect non-oil and gas mineral values. The system of management proposed for this area would allow up to 100 percent of the Resource Area to be leased for oil and gas, and none of the alternatives considered in the planning document entertain any reduction in the area open to this activity. The failure of the draft plan to afford sufficiently stringent protection to the two proposed Areas of Critical Environmental Concern is a serious shortcoming. Finally, at issue is the degradation of roadless areas that were not included by the BLM in its designated Wilderness Study Areas, many of these areas should be included in the WSAs that BLM has proposed.

In particular, the plan should be modified as follows:

(1) The following Special Recreation Management Areas should be withdrawn from entry for oil and gas development in order to protect their essential non-fuel values: Absaroka Foothills, Badlands, Bighorn River, and Red Canyon.

(2) ACEC status should be extended to the Badlands SRMA on account of its extraordinary scenic values and the fragile soils that it contains. Such areas afford outstanding visual resource opportunities as well as valuable sites for paleontological study.

(3) All areas still at issue in terms of their WSA status, including those in the "Conservationists' Alternative," should be withdrawn from any leasing for oil and gas or entry for other minerals. This includes, of course, all lands now formally designated as WSAs. Such withdrawal is essential to fairly resolve the potential wilderness status of these lands.

219.2

Mr. Bob Ross, Team Leader
4/5/95
Page 2

(4) Specific range improvement goals, including a timeline for accomplishment, should be included in the plan to address the impacts of excessive livestock grazing in the Resource Area. Improving the health of the rangeland is essential to protecting the long-term agricultural base of Wyoming's ranching industry, even if this means temporarily reducing stocking levels or revising allotment management plans.

In closing, I note that the oil and gas resources will always be available for development, should that prove necessary; the other values that these lands afford are fragile and must be protected if they are to be passed intact to the next generation.

Thank you for your attention to these comments, and I urge you to reconsider the apparent pro-development direction and emphasis of the draft Management Plan.

Very truly yours,

Jonathan M. Teague

Jonathan M. Teague

RECEIVED
APR 10 1995
[redacted]

220

April 3, 1995

Mr. Bob Ross
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing with reference to the draft management plan for the Grass Creek Resource Area in the Bighorn Basin. I would like to propose the following as some changes that should be made to that management plan:

- The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil development.
- The Badlands Special Recreation Management Areas should also be designated an Area of Critical Environmental Concern because of its spectacular scenic and extremely fragile soils.
- All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal, including lands outside Wilderness Study Areas should be protected.
- More definite goals to address the problems of overgrazing in the resource area should be provided as well as a timeline to accomplish those goals in the next five years.

Thank you for considering these proposals for the future enjoyment of Americans to follow us.

Sincerely yours,

Mary Thompson

221

Gladys J. Van Meter
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxx

Bob Ross, Team Leader
Bureau of Land Management
Worland, Wyoming 82401

Dear Mr. Ross,

I am very concerned about what is being planned for the Grass Creek Resource Area. Such a beautiful area should be left alone. We are constantly destroying so many places in our Country. we should be trying to control the population!!

The Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas should definitely be protected from Oil development.

Badlands S.R.M.A. should also be designated an ACEC because it has extremely fragile soils.

Protect all areas to the BLM's Wilderness proposal including lands outside Wilderness Study Areas.

And to provide more definite goals to address the problems of overgrazing area.
I love what's left of our beauty in this Country. We are gradually losing so much of it. I urge you to please do what you can to save all of these areas I've mentioned.

Sincerely,
/s/ Gladys J. Van Meter
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxxxx

RECEIVED
APR 10
[illegible]

222

Dear Mr. Bob Ross,

I recently heard of the Bureau of Land Management's plan for the Bighorn Basin. To my knowledge the plan allows for 100% of the resource area to be leased for oil and gas development. These areas, such as The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Area, should be protected from this oil development. The Badlands SRMA should be designated as an Area of Critical Environment Concern because of its spectacular scenic and extremely fragile soils. All areas included in the Conservationists' Alternative to the Bureau of Land Management Wilderness Proposal should be protected including lands outside of the Wilderness Study Areas. Finally, one should provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years. I strongly believe that these changes are needed to preserve our lands and I hope that these changes do get proper consideration.

Sincerely,

Traci Bergen
[redacted]

223

April 6, 1995

Bob Ross
BLM Team Leader
P O Box 119
Worland, WY 82401-0119

We are writing regarding the BLM's Grass Creek Management Plan that threatened Absaroka Owl Creek Mts that some unique desert environment with increased oil & gas development.

It seems we the people must be ever vigilant regarding our public lands. The proposed resource management plan places unacceptable emphasis on providing motorized recreation activities.

BLM needs to provide greater protection for potential natural landmarks. There are areas (you know what they are) of critical environmental concern in the resource area that should be off limits to oil & gas leasing & development.

Hard rock mining withdrawals should be encouraged because of the antiquated 1872 mining law.

BLM should place a greater emphasis on managing Fish & Wildlife habitat.

In closing the BLM does not have the best interest of the land & the "people of the west" at heart.

/s/ (Mrs) M. Temple
/s/ (Mr) C Temple
xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxx

RECEIVED
APR 11 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

224

04/07/95

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross,

I am writing you this letter to inquire you and the Bureau of Land Management to amend the proposal for oil and gas development with the Bighorn Basin Plan.

I was on staff involved with the oil industry some years ago and worked on a number of wells throughout the state of Wyoming. The areas where this drilling is proposed are areas of extreme beauty and deserve to be set aside for citizens to appreciate and enjoy. I have visited these areas myself a number of times and have driven through them on my way to Montana regarding my former work.

It is my belief that these areas were they explored for hydrocarbons would realize little production. However, the development of an oil industry there would seriously compromise their value as a national resource and historically as areas considered by our ancestors western. Areas such as these need to be conserved and set aside for the public benefit; as a place to visit and pursue recreation.

It is my belief that these areas rank as the most beautiful within the State of Wyoming. In these times of financial considerations, and budgetary problems it is simply too easy to overlook the long-term benefit for the short-term quick fix.

To this end, if these areas are decimated for potential immediate financial gains, future generations will be deprived of this irreplaceable natural resource and the American public will be the ultimate losers.

My belief concerning these matters is that the Federal Government has the duty to protect our national treasures for present and future generations.

To this end I ask that you modify the above plan mentioned to protect the Absaroka Foothills, Badlands, Big Horn River and the Red Canyon Creek Special Recreation Management Areas from future development of all kinds and preserve these areas for the American people.

Thank you for your patience in hearing my request.

Sincerely,

Harvey M. Hoffman

RECEIVED
APR 11 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

225

[redacted]

April 6, 1995

Bureau of Land Management
101 E 23rd
Worland, WY 82401

Dear Sirs:

This is a request that the Grass Creek Draft not be implemented for the following reasons:

(1) Predator control is not properly addressed. Without farmers, BLM and predator control programs working together the coyot land would soon become nothing more than a wasteland. Coyotes, foxes, raccoons, skunks, and ravens would deplete the wild game to low numbers, plus there would be an increase in rattles and diseases. Look at Yellowstone Nationl Park, Lake Hatchery, Lake Shoshoni, lots of weeds. There is all the recreation promised this hasn't shown up!

(2) There is no need for the same horses some wild range. There are plenty of them in the Pryors. One of the largest sediment areas filling Yellowtail comes from that area.

(3) Land should be managed so that animal oil, gas, and minerals can be harvested. That is the main lot-1 tax base. Then farmers and settlers came in and started farming and irrigating, the number of wildlife animals increased, and they not animals got different food. There is a special place to have cattle and sheep grazed at the time is, the best is cattle, sheep and wildlife. This land has been utilized for over 100 years by ranchers and settlers. In its draft mode to remove people including BLM personnel from Wyoming, so it will really turn into a vast waste like the Colorado tumble weed Ringelands?

Please do not make it harder to do business or reduce our efficiency.

Respectfully,

Reed Williams
Reed Williams

RECEIVED
APR 11 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

226

Charles C. Tucker

[redacted]

April 6, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
Post Office Box 119
Worland, Wyoming 82401

Re: BLM's recently released draft management plan for the Grass Creek Resource Area, Bighorn Basin.

Dear Mr. Ross:

I have recently received a communication from the Sierra Club regarding the above noted "draft," and feel compelled to contact you in an effort to urge you to consider the following points:

It is the opinion of the Club, and myself that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas should be protected from oil, and natural gas development. Due to it's soil fragility, the Badlands SRMA should also be designated an ACEC.

Protection of all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal should be made mandatory; this protection pertaining to all lands outside Wilderness Study Areas.

More definite goals need to be initiated to address the problem of overgrazing in the resource area, and a timeline to accomplish these goals over the next five years should be designed, and made available to the general public, through appropriate channels, for it's input.

Your consideration of the above material will be greatly appreciated, and I hope that an equitable decision to all concerned will be made!

Sincerely,

Charles C. Tucker

CHARLES C. TUCKER

COPY: FILE

RECEIVED
APR 11 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

227

April 10, 1995

Bureau of Land Management
Grass Creek Resource Area
Attn.: Bob Ross
P.O. Box 119
Worland, Wyoming 82401-0119

Rebecca Waspler

[redacted]

Dear Mr. Ross:

As a Wyoming native and lifetime user of the federal lands within the State, as a biologist and trained and experienced public lands administrator, and as a published nature writer and wildlife film-maker, I wish to express my support for livestock grazing on the Grass Creek Resource Area.

I protest the BLM's use of the current grazing leases numbers to determine animal units per month figures. No base line data or grazing studies back up these reduced figures. Grazing does no harm to the resource, in spite of the myths currently in vogue that defame livestock on public lands. I request that the BLM choose to be fiscally responsible and reasonable and support an industry that supports the Bureau back, local livestock grazing.

Sincerely,

Rebecca Waspler

Rebecca Waspler

228

4-6-95

Bob Ross
Team Leader
Bureau of Land Management
P O Box 119
Worland, Wyoming

Mr. Ross, I am concerned that the recently released draft management plan for the Grass Creek Resource Area does not sufficiently protect the area from environmental harm. Please consider the following changes;

1. The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Management areas should be protected from oil development.
2. The Badlands SRMA should be designated an ACEC because of its spectacular scenic qualities and fragile soils.
3. Protect all areas included in the Conservationist's Alternative to the BLM Wilderness Proposal including lands outside Wilderness Study Areas.

[page 2]

4. Provide more definite goals to address the problems of overgrazing in the resource area with a timeline to accomplish those goals in the next five years.

Thank you for your consideration.

Sincerely yours,

/s/ Bernard Kerosky
XXXXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXXXXXX

RECEIVED
APR 12 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

229

April 11, 1995

Worland BLM
Bob Ross, RMP Team Leader
Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

I would like to take this time to comment on the recent draft management plan for the Grass Creek Resource Area of the Big Horn Basin.

Listed below are the areas in which I object:

- Absolutely no credit given to the technologies in any of the multiple use industries from which the environment benefits.
- The loss of significant dollar revenues to all four counties (Park, Hot Springs, Washakie, and Big Horn) without any consideration for the impacts to the people and state economy.
- Inadequate range of alternatives from which to chose. 71% of the statements comparing the alternatives all read, "Same as Preferred." This violates the National Environmental Policy Act (NEPA).
- Clear bias AGAINST grazing. The Preferred Alternative reduces grazing by 25 percent.
- Unreasonable restrictions on the Oil & Gas industry in the preferred alternative. Absolutely no consideration was given to the development and use of new technologies. No credit or value is assigned to produced water and wildlife habitat developed from oil and gas activities.
- The BLM's attempt to create more Wilderness without congressional consent by managing areas as though they are wilderness (defacto) when they aren't Areas such as Upper Owl Creek, Badlands Red Canyon Creek.
- Motorized recreation being negatively impacted via wilderness management.

Thank you for this opportunity to comment.

Sincerely,

Connie Stwartz
Connie Stwartz
[redacted]

RECEIVED
APR 12 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

230

April 11, 1995

Worland BLM
Bob Ross, RMP Team Leader
Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

I would like to take this time to comment on the recent draft management plan for the Grass Creek Resource Area of the Big Horn Basin.

Listed below are the areas in which I object:

- Absolutely no credit given to the technologies in any of the multiple use industries from which the environment benefits.
- The loss of significant dollar revenues to all four counties (Park, Hot Springs, Washakie, and Big Horn) without any consideration for the impacts to the people and state economy.
- Inadequate range of alternatives from which to chose. 71% of the statements comparing the alternatives all read, "Same as Preferred." This violates the National Environmental Policy Act (NEPA).
- Clear bias AGAINST grazing. The Preferred Alternative reduces grazing by 25 percent.
- Unreasonable restrictions on the Oil & Gas industry in the preferred alternative. Absolutely no consideration was given to the development and use of new technologies. No credit or value is assigned to produced water and wildlife habitat developed from oil and gas activities. Extremely large areas are set aside as no surface occupancy and controlled, these designations economically prohibit oil and gas development and should therefore be changed to allow reasonable development of at least one well per 40 acres.
- The BLM's attempt to create more Wilderness without congressional consent by managing areas as though they are wilderness (defacto) when they aren't Areas such as Upper Owl Creek, Badlands Red Canyon Creek.
- Motorized recreation being negatively impacted via wilderness management.

Thank you for this opportunity to comment.

Sincerely,

Mike Mueller
Mike Mueller
[redacted]

RECEIVED
APR 12 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

231

C. David Fridge
[redacted]

April 7, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am writing to express my concern over the Bureau's draft management plan for the Grass Creek Resource Area. If the current plan is implemented it will permit virtually uncontrolled oil and gas development in this beautiful part of the state. I strongly believe that this is not appropriate and would like to suggest the following changes to the management plan;

- The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Area (SRMA) should be protected from oil development.
- The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.
- Protect all areas included in the Conservationist Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.
- Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.

Mr. Ross, as you know, the Grass Creek Resource Area is located in one of the most beautiful parts of Wyoming. To provide for a laisze faire system of management which allows 10% of the resource area to be leased for oil and gas development is not right. I ask you to consider revising the plan to address the items outlined above.

Respectfully Yours,

David Fridge

RECEIVED
APR 13 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

232

April 11, 1995

Bob Ross, BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear: Bob Ross,

Having reviewed the proposed Grass Creek Management Plan we offer the following comments.

1. No problem in allowing limited use by the industries for the development of improvements such as water that directly benefits the land & wildlife.

2. The attempt to manage the land as if it were wilderness, restricting use by industries & recreation will be unreasonable & will devitate our life style.

3. We are amazed to find 7½ of alternatives comparing alternatives all road, " Jump Ad Preferred".

4. With the 25% cut in grazing, the restrictions on mining, timber, gas, oil & recreation use there will be a significant loss of revenues to Park, Hot Springs, Washakie & Big Horn Counties.

If the people in these counties can not make a living just how do you expect we can support your jobs? Where do you get your money from? Why do you want to kill the Goose? We urge you to take a hard look & rewrite this total plan. The economic future & lifestile of this entire area is at stake.

Sincerely,

Jack Bratten

Jack Bratten

Roberta Bratten

Roberta Bratten

RECEIVED
APR 13 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

233

Bob Ross
BLM Team Leader
POB 116
Worland, WY 82401-0118

Dear Mr. Ross:

Re BLM Grass Creek Management Plan

1 The BLM's Proposal to Open Wilderness Study Areas to Hard Rock Minerals Mining, motorized vehicle use, and oil and gas development is unacceptable.
2 BLM should manage more of the resource area for semi-primitive, non-motorized recreation activities.
3 BLM needs to provide greater protection for potential natural national landmarks
4 Areas of critical environmental concern in the resource area should be off limits to oil and gas leasing and development.
5 The South Fork of Owl Creek meets the criteria for a national wild and scenic river.
6 Hard rock mineral withdrawals should be encouraged
7 The proposal to allow oil and gas leasing and development on every single acre of legally available public lands is clearly excessive and violates BLM multiple use mandates
8 More attention needs to be given to improving the condition of riparian areas and rangeland.
9 BLM should place a greater emphasis on managing fish and wildlife habitat.

Singerely,

John Savarese

Powell Office Supply

234

RECEIVED
95 APR 14 AM 9:10
BLM WORLAND W.O.

265 North Bent
P.O. Box 870
Powell, Wyoming 82435
(307) 754-4154
FAX 307-754-5778

4/15/95

Worland BLM
Bob Ross
RMP Team Leader
Box 119
Wor Land, WY 82401-0119

Mr. Bob Ross,

I am writing to you concerning the Grass Creek Resource Area.

I have some major objections to the current trend of the management objectives. Among those are multiple use lands you seem to have a bias against grazing by reducing it an unreasonable amount along with unreasonable restrictions on the Oil and Gas industry. Your preferred alternative will also impact motorized recreation in a negative manner.

Your Preferred Alternative gives the appearance of wilderness management with out congressional consent. No credit is given to the multiple use industries environmental benefits. There seems to be a violation of the National Environmental Policy Act with inadequate range of alternatives from which to chose with over 70% of the alternatives only stating same as preferred.

I could go on, but you should get my drift by now, that out of state preservationists that don't make a living in Wyoming should not be the ones to dictate the use of lands in my back yard.

I make my living in Wyoming and was born and raised in Powell. I can see nothing but loss of revenues for the four counties of Park, Hot Springs, Washakie, and Big Horn with our Preferred Alternative. If you don't factor in the costs to these counties you should figure out a larger revenue source than is available now to keep the employees, that the local business such as mine support, from the welfare and unemployment lines. Loss of our current or future tax base can be very tough on small businesses in this area that would have to pick up the tab loud.

Thank you for your time.

David S. Simons

David S. Simons
Native of Wyoming

235

April 13, 1995

BLM
Worland, Wyoming
Grass Creek Resource Area
Attn: Bob Ross RMP team Leader
Sir

About the draft plan about the Grass Creek Resource Area.

I don't believe it gives any credit to the multipal use industries like logging, oil companies and grazing. Theyve developed road & water so some of the ground could better used as multiple use with very little damages. They are managing their own activities very well on their own, without all the restriction that the draft proposes. If they don't someone is ready to sue them. Through all the modern technologies the industrie can develope some things that were not practical ever 20 year ago.

The reducing of grazing is cutting out a lot of ranches that have been in operation for years. There has been no mention of the local manager, the rancher, who is better informed about the ground than the person who has spent a livetime there? I believe the local people should be more involved in this draft. closing some of these road, are nothing but a back door way of controlling private owned properties. Foot and horse back is a cop out. It eliminates 99% of the people. Is this multiple use? Those wild horses on Fifteenmile Creek, should be eliminated, as theyre not what I would call wild. Their ancestors are escaped horse from around the area. More work horse blood than any. It would save several million dollars over the years.

[page 2]

This draft should be thrown out and rewritten with the impact of the local government and state as the natives are the one affected, through their livelyhood and cultures

Thank you
/s/ Hugh Vass
xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx
xxxxxx

RECEIVED
APR 18 1995
CODY WYOMING

236

Mr. Bob Ross
BLM Team Leader
Bureau of Land Management
Post Office Box 119
Worland, WY 82401-0119

April 17, 1995

Dear Mr. Ross:

I'm writing today on behalf of the 600 plus Cody Country Chamber of Commerce members.

The Cody Country Chamber of Commerce believes the Grass Creek Resource Area Management Plan is severely flawed and that the preferred alternative is not acceptable.

Specifically we believe that there are undue restrictions on the ability of individuals to make a living, to the long term survival of this region. The Yellowstone Development District, which is a four County Economic Development District formed under guidelines from the U.S. Department of Commerce Economic Development Administration, has done extensive analysis on the economies of Park, Hot Springs, Fremont and Sublette Counties. The inescapable conclusion of this analysis is that when our employment base drops below 6% in mining, oil and gas, then we see sharp increases in the number of welfare cases and people leaving the area. Restrictions on the amount of acreage leased in the Grass Creek RMP will severely deter future oil and gas development and accordingly reduce the level of mining, oil and gas employment in Hot Springs and Park Counties. This reduced exploration and development will also lead to significant loss of revenues to the counties of the Big Horn Basin, because of the loss of potential production and lease opportunities.

We also believe it is inappropriate for the Grass Creek RMP to reduce livestock numbers by 25% or 2,000 AUMs. We feel that there may already be these kinds of reductions occurring voluntarily by the livestock industry, it is poor planning to arbitrarily reduce these numbers in a resource management plan, which would foreclose the opportunity to increase those numbers should increased grazing be warranted and justified.

Lastly, with the BLM's shift in emphasis from commodities use toward recreation, there needs to be a clear understanding that our recreation industry is tied very closely to commodity usage. People coming out west are looking for a western experience and

RECEIVED
APR 18 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

236.2

Mr. Bob Ross
Page 2
April 17, 1995

that includes finding cowboys on the range. You do not have cowboys on the range without cows on the range. It has also been clearly demonstrated that when commodity uses become more restricted, it is soon followed by other restrictions that impact access to public lands by recreation users.

The Cody Country Chamber of Commerce believes the Draft Grass Creek Resource Management Plan needs to be redrafted with more consideration for the commodity users, the recreation industry and the economy of the counties within the resource area.

Best regards,

Paul Hoffman
Executive Director

PH/dr

RECEIVED
APR 18 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

237

Bob Ross/BLM Team Leader
Worland BLM
Box 119
Worland, WY 82401-0119

4-11-95

Dear Mr. Ross,

The intent of this letter is to adamantly oppose the preferred alternative for management of the Grass Creek Resource Area as outlined by your draft management plan.

Plain and simple this plan is an outrage! This appears to be just another attempt by the long arm of the Federal Government to restrict multiple use of public lands for the sake of the liberal preservationist agenda. It also appears to be an attempt to set a precedence for future BLM land control policies which do not adequately reflect the concerns or interests of the local inhabitants of these areas.

The land can be better managed for the good of most people from both an ECONOMICAL as well as ENVIRONMENTAL standpoint by multiple use concepts which are now in place.

A well balanced plan does not eliminate 25% of the cattle grazing to accommodate more deer and antelope which contribute little to the local economies in this area.

The unreasonable restrictions on the Oil and Gas industry addressed in the Preferred Alternative are way out of line. No consideration was given to the development and use of new technologies or to the fact that the industry in particular has cleaned up its act immensely in the last several years. This industry IS now operating in close proximity with the environmental concerns of all of us. We desperately need the economic funding for our local schools and expenses, not to mention the number of people working directly in this industry who contribute to the local economies and tax base. The rest of the nations people need and use these resources as well.

It is clear that the BLM is way out of line when it attempts to create more Wilderness without congressional consent as it has done in areas such as Upper Owl Creek and Buffalo's Red Canyon Creek. Again we are talking CONTROL issues and not sound management practices.

This plan appears to be about as well intentioned for the local land working folks as the Spotted Owl was in the Northwest or the Wolf reintroduction force in the Yellowstone and Central Idaho. Is this not just another frontline maneuver in the ever expanding war for control of the West?

Sincerely,

Ed Lemmon
Rd Livingston
[redacted]

RECEIVED
APR 18 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

238

[redacted]

April 17, 1995

Worland BLM
Bob Ross, BLM Team Leader
P. O. Box 119
Worland, WY 82401-0119

Regarding: Grass Creek Resource Area Plan

I am opposed to your preferred Alternative in this draft plan, as I strongly feel it is too restrictive. As a time when our Wyoming economy desperately needs revenues to finance our schools and governments, we should not be slamming the door on oil and gas industry and ranchers dependent on the public lands for grazing.

I feel the oil and gas industry, with it's new technologies, should be given more consideration as they can reduce the impact of past years on our environment. They have done a great deal as far as water development for wildlife. They re-claim the lands used, to better than before use. They do little damage as far as displacing wildlife. Most wildlife adjusts surprisingly well.

I believe the preferred alternative reducing grazing as much as 25% is too much. I realize some allotments need some adjustments, and that monitoring by the BLM and ranchers can do more for the range conditions on a seasonal basis according to the rainfall and climate.

It seems to me that by regulations, rather than by bills passed by Congress, you are attempting to gradually move, more and more public lands to wilderness designation. When in fact, they are not.

I absolutely believe we need to continue to have a multiple-use policy on public lands for the various industries and users in order for our country to generate enough revenue to reduce the National Debt. It's got to be our No. 1 priority, while careful management, not extreme over-see our environment.

Sincerely

Shirley Bales

RECEIVED
APR 19 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

239

Stan and Jane Wozniberg

Mr. Bob Rose, Team Leader
PO Box 119
Worland, Wyoming 82401

Dear Bob,

On April 3rd, Stan and I attended the Grass Creek Public Hearing held at the Elks Club in Worland. We were impressed with the amount of questions that evening, and the intelligence with which they spoke. It was obvious they had studied your publications and that their conclusions were well thought out and reasonable.

Timbering, grazing, energy productions, recreation, culture and customs were all addressed, and most found discrepancies throughout the RMP. What was most disturbing was that your prior RMP's didn't agree with the current one as far as the figures you were using for oil production, grazing and timbering to mention a few.

It also seems that BLM currently holds the idea that the so-called wild horses are drawing tourists. It is our feeling that people who come to the West, do so to see cowboys, cattle drives, branding, mountains, and I don't tell you how many times I've seen people parked on the side of the road to take a picture of the oil pump that is at the top of the hill going towards Ten Sleep. Tourists come here to see what's still real about the West. They are sophisticated and know what is real and what is a "big and pony" show. We are the pioneers of the West.

We have unfortunately been all to silent about what we are thinking up to now, which is part of the reason things have gotten so messed up. But now, because of your giving the extra mile by having public hearings, and open houses, as you did on the 3rd, you are hearing what is in the hearts and minds of the people who live here, and are trying to survive here. We urge you to take what is so hard for people to say, seriously. I would hope to see a board line you use to have with members of the general public representing, as much as possible, all the different interests that are in our surrounding communities. If these people had input to your RMP's there may not be as much to argue about once they are completed. We would like to thank you for the time and effort from all of you during the Grass Creek Public Hearings.

Sincerely,

Stan and Jane Wozniberg

240

RECEIVED
APR 19 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

SIERRA CLUB
GREAT PLAINS REGION
COLISEUM BUILDING
23 NORTH SCOTT
SHERIDAN, WYOMING 82801

(307) 672-0483
Fax (307) 674-6147

April 17, 1995

Bob Rose
Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Bob,

The following are the Sierra Club's comments regarding the Grass Creek Resource Management Plan and Draft Environmental Impact Statement:

Alternatives

The SLM seems to feel that it does not need to examine the full range of alternatives for many for the resources uses currently occurring in Grass Creek. For instance, in all of the alternatives, 100% of the Resource Area is leased for oil and gas development. The BLM really needs to make a more concerted effort into finding out a range of alternatives instead indicating that only one alternative is available.

Wild and Scenic Rivers

The south Fork of Owl Creek is very deserving of being found suitable for Wild and Scenic River designation. Owl Creek would make a spectacular addition to the Wild and Scenic Rivers System because of the beautiful canyon where it is located. The South Fork of Owl Creek obviously has outstanding scenic values, and these values should have been recognized in your eligibility and suitability analysis.

Oil and Gas

The oil and gas leasing activities outlined in the plan will not protect the concept of multiple use. Leasing 100% of the legally available lands in the resource area is leaving multiple use in favor of just one use; oil and gas development. With the exception of the wilderness study areas, every single acre of land and mineral estate in the Resource Area is opened to oil and gas leasing. This includes Areas of Critical Environmental Concern, Special Recreation Management Areas, and important

"Not blind opposition to progress, but opposition to blind progress."

240.2

wildlife areas. The BLM really needs to rethink this "lease everything" mentality because it is not good for the resources.

The meager stipulations outlined in the plan will do little to protect environmentally sensitive lands from the onslaught of oil and gas development. In fact, the Grass Creek Resource Area has gained a level of infamy for cutting four overlapping No Surface Occupancy stipulations along the North Fork of Owl Creek. The Resource Area has a proven track record of being unable to protect lands through the use of stipulations. Thus, the use of the no lease designation is the only thing that will protect environmentally sensitive lands in the Resource Area.

Grazing

The BLM needs to be more specific with a timeline for getting grazing allotments in a better ecological condition. Although authorized use is being reduced in the draft plan, actual use is currently lower than authorized use and the numbers are still too high. Because of the high percentage of Category "I" Allotments in the Resource Area, the BLM must be more specific on how it will deal with the problem of overgrazing in Grass Creek. This is why a very specific timeline for improvements is needed.

The BLM also needs to include very specific and standardized utilizations levels for both riparian and upland areas within Grass Creek Resource Area. Once these utilization levels are reached, the BLM must insist that the cattle be removed from the allotment. We also believe that ranchers should monitor utilization levels and that the BLM role for its range conservationists be geared much more to enforcement. The BLM also need to dedicate some of the AUMs in the Resource Area to wildlife.

Timber

The cut proposed for the Resource Area appears much too high. No allocation was made to the protection of old growth timber and biodiversity. The BLM needs to reduce the cut on the Grass Creek Resource Area. With only 14,000 acres of commercial lands in the Resource Area, we view 300,000 bf of timber a year as being unsustainable. Proposed timber harvest levels would effect between 1,500 and 1,900 acres of land. We could find no discussion regarding regeneration rates, but it definitely appears that the forestry practices are not being based on a sustained yield rate or that any portion of the commercial forest lands are being dedicated to being left in an old growth state.

Recreation

The BLM needs to manage more of the Resource Area for semi-primitive, nonmotorized recreation. Demand for this type of recreation is predicted to rise significantly. Once areas are developed with roads and other facilities, there is little

240.3

likelihood that lands will be returned to a natural condition conducive to this type of activity. The Badlands Special Recreation Management Area is a place where the BLM could designate a percentage of the land area for semi-primitive nonmotorized activity because much of the area still retains its natural character.

National Natural Landmark Nominations

The BLM needs to provide better protection for the Gooseberry Creek and East Ridge-Fifteen Mile Creek Badlands National Natural Landmark nominations. Although both of these areas for the most part are included in the Fifteen Mile Creek Watershed ACEC, the ACEC management prescriptions do not include protecting the outstanding natural and scenic values of these badlands. Instead the ACEC is strictly geared to improving water quality in the Fifteen Mile Creek Watershed. If water quality is the only management goal of this ACEC, then it could be detrimental to maintaining the badlands in a natural state. The badlands are obviously one of the major contributors to sediment load in Fifteen Mile Creek, and the goal of reducing sediment could adversely these beautiful features. We recommend that the management goals of the Fifteen Mile Creek ACEC be expanded to include protection of scenic and natural values.

We appreciate this opportunity to comment.

Sincerely yours,

Kirk Koepsel
Associate Representative

RECEIVED
APR 19 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

[redacted]

241

April 16, 1995

Worland BLM
Bob Ross, RMP Team leader
P.O.Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

I have read the Grass Creek Resource Area Management Plan. Of the choices, I would find Alternative B as being the least objectionable. However, I do not understand why the Federal Government is spending so much money on this study when the U.S. is actually so far in debt that it may never repay all of its loans. I think that all of these so-called problems and concerns are just trumped up hot air.

Most of the land is badlands where so few people travel there that it has very little impact on the environment. The die-hard environmentalists have proven that they are actually out for power and care not a whit for practical solutions to anything. The BLM is playing into the hands of those that wish is take the public lands away from the people. The public lands belong to all of the American people and not to a select group of power seekers using the environment as a smoke screen.

There is no scientific proof that the national forests are over harvested, or that the oil and gas industries are destroying the land. There is no real reason to lower the grazing allotments. The wild game and the wild horses are not being threatened. Minor adjustments where problems do exist could be solved within the old framework. Who is going to pay the salaries of all the new people needed to patrol the whole area to make sure all of the restrictions are obeyed? Does the BLM have such an increase in its budget? It seems to me that budgets of government agencies are being decreased not increased.

We are not talking about local or yearly adjustments due to drought, etc. Impacts are being set up that will get worse with time. A "Pandora's Box" is being opened, setting up very dangerous precedents for the future where Washington bureaucrats will slowly impose more and more restrictions until the American people will no longer have access to their land. Even the local people working for the BLM will be hurt, because they are part of the American public. The government is supposed to be the servant of the Sovereign People, and not the other way around.

241.2

In this case, it is not a compromise over opinions, which has always been the American way, but it is a compromise with strong beliefs and principles. One cannot compromise with Freedom. One can't be "just a little bit pregnant".

Wyoming used to be a large oil producer, but today, because of all of the imposed restrictions and time necessary to obtain all of the permits, etc., oil companies can actually drill a wildcat well in Texas or Oklahoma for the same amount of cost and effort that it takes to just get the OK in Wyoming on BLM land. That is ridiculous. Not only is the tax base in Wyoming being eroded by Washington bureaucrats, but America needs all of its resources functioning in case of a war or other emergency.

Where is the government going to get the funding to build roads to the archeological sites and maintain the signs, etc.? If these sites are built for the "public", bath rooms will be needed. Who is going to take care of them? The Federal Government is always pushing its weight around, but where is the funding coming from? The U.S. citizen is tired of paying taxes to pay for losing his own freedom. I would urge for the BLM to reconsider all of the costs involved, and make the die-hard environmentalists come up with scientific proof that these problems exist.

Beyond that, I think that all citizens want to conserve the country so that our children can enjoy it. The BLM has, up till recently, been very good about [illegible] a balance to safeguard America's resources. I hope that it will remain a good custodian in the future by being reasonable and logical. It should not be swayed by loudmouthed groups with large funding who only seek power to dictate their own terms on the sovereign people of Wyoming and America.

Sincerely yours,

David Gialdini

David Gialdini

RECEIVED
APR 19 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

242

April 16, 1995

Bob Ross
BLM Team Leader
P O Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

We would like to take this opportunity to say that we find the BLM's proposal to open up wilderness study areas to hard rock minerals mining, motorized vehicle use, and oil and gas development unacceptable.

The Owl Creek, Sheep Mountain, Red Butte and Bobcat Draw Badlands wilderness study areas should be managed to retain wilderness character whether Congress decides on wilderness designation or not and more of these resource areas should be managed for semi-primitive, non-motorized recreational activities.

The BLM needs to provide greater protection for potential National Natural Landmarks by prohibiting oil and gas leasing/development and hard rock mining and giving them a visual resource management classification of "VRM II".

We support the BLM's proposal to establish the Fifteenmile Creek, Meteetsa Draw and Upper Owl Creek ACECs but want to see these areas placed off limits to oil and gas leasing and mineral development. Please acknowledge and protect the extraordinary recreational and natural resource values of the Fifteenmile Creek Watershed Area.

We do not agree with the BLM'S determination that the South Fork of Owl Creek is "not eligible" for inclusion in the National Wild and Scenic Rivers System and should be protected whether given this distinction or not.

We support the BLM's proposal to remove the following important areas from mineral development: public lands along the Bighorn River, the Legend Rock Petroglyph Site, parts of the proposed Meteetse Draw Rock Art ACEC and all of the proposed Upper Owl Creek ACEC. Also, please consider extending the proposed mineral

RECEIVED
APR 19 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

242.2

Team Leader
April 16, 1995
Page 2

withdrawal to the four existing BLM-designated Wilderness Study Areas in the planning area that will be without any protection if Congress decides against designation.

The proposal to allow oil and gas leasing/development on every single acre of legally available public land is clearly excessive and violates the BLM's multiple-use mandate.

We also feel that more attention needs to be given to improving the condition of riparian areas and rangeland. A more agressive use of coordinated range management techniques coupled with time-controlled grazing practices would greatly improve ecosystem health and biodiversity. Also, the BLM should place greater emphasis on managing fish and wildlife habitat. In reference to the WGFD's plan, such words as "to the extent possible" and "where appropriate" are weak words and should be stricken. We support the wildlife prescriptions in Alternative C because it is the only alternative that provides adequate protection for all big game winter range.

We appreciate your consideration in this matter and trust that the BLM will take our concerns seriously.

Sincerely,

Barbara Wilmette Zancanella

John Zancanella

243

April 18, 1995

Mr. Ross,

Sir, This letter is in regards to the Draft Management Plan for the Grass Creek Resource Area.

I would encourage the BLM's Plan to reflect recreational user (non-motorized), habitat, and watershed. Hard rock mining, gas and oil leases, and use of motorized vehicles should be restricted in the area. I would also encourage that the present WSA's in this region be managed as such regardless of future Congressional action. It would be a loss to the state to lose the primitive or semi-primitive nature of this region.

Respectfully yours,
/s/ Mark David Johnson

Mark David Johnson
xxxxxxxx
xxxxxxxxxxxxxxxxx

244

MICHAEL WALL

Dear Bob--

Please do what you can to modify the BLM draft Grass Creek Management Plan to maintain this area for Wilderness purposes and to eliminate motorized vehicle use, mining, oil and gas.

Let's try to hold onto this area for as long as we can - hopefully forever. It's [page 2]
to good to lose. Further intrusion of vehicles and mining will just ruin this beautiful area.

Yours Truly

/s/ Michael Wall

xxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx

RECEIVED
APR 20 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

245

Jack Smith
[redacted]
April 19, 1995

Worland District BLM
Bob Ross, RMP Team Leader
P.O. Box 119
Worland, WY 82401-0119

Re: Grass Creek Draft EIS

Dear Mr. Ross:

I would like to comment on the Grass Creek Resource Area Resource Management Plan, Draft EIS. I feel the draft plan is a well planned out document and I strongly support the preferred alternative. This document is a good balance between resource extraction and protection.

I am very much in favor of the proposed ACEC areas (especially the Upper Owl Creek Area). ACEC designation will allow resource utilization, but only after special consideration to environmental conditions (critical wildlife habitat, significant archeological resources, unique plant species, outstanding scenic qualities, highly erosive soils, etc.) that make those areas important to the resource area.

There are two issues I feel need further addressing in the Draft EIS:

1. Cultural Resource Management Areas. Several years back I remember reading about an extensive study of a significant Sheepeater Indian cultural site in the vicinity of Scopy Dale Peak. I believe the site was on public lands. Should this, or other Sheepeater Indian encampment or hunting sites on public lands be included in a cultural resource management area?

2. Wild and Scenic Rivers. Appendix 1 reports none of the 123 waterways within the resource area were eligible for wild and scenic river status. I feel the 12 mile segment of the South Fork Owl Creek from near Slab Creek (Sec. 27, T.43N., R.102W.) downstream to the eastern edge of Sec. 31, T.43N., R.100W. should be evaluated as a wild river. This segment of river is 100% public land on the north and 100% Wind River Indian Reservation on the south. I feel the segment qualifies for wild river status under the following:

   a. Free Flowing. This segment is free flowing. There are no impoundments, diversions, or modifications to the natural waterway.

   b. Outstanding Remarkable Values. This segment of the river passes through the east-west Owl Creek Mountain uplift forming an exceptionally scenic canyon up to 1000 feet deep. This canyon exposes the geology of the area, unique due to

245.2

an uplifted area buried by volcanic deposition. The canyon is important wildlife [redacted] for raptors and big game.

   c. Other Conflicts. All public lands in this segment are found in a power withdrawal, minimizing conflicts with leasable minerals. Anchor Dam is immediately downstream and the potential for another impoundment in this segment would seem very low due to the existence of that dam and the nature of the area's geology.

Again, I would like to express my opinion that the Grass Creek Resource Area Resource Management Plan is a well planned and well thought out document and I thank you very much for the opportunity to comment.

Sincerely,

Jack Smith

246

April 16-1995

Worland B.L.M.
Bob Ross, R.M.P. Team Leader Box 119

Curtis Larsen
xxxxxxxxxxxxxxxxxxxxxxxxxx

Dear Mr. Ross

Am writeing in defense of multiple use concept of natural resources use by man. Resources were put here for mans use now and in the future.

Having lived my life next to creation I have witnessed much change generaly for the better if tax payers are denied use of resources communities will dry up.

I cannot believe that regulations imposed by federal agencies will preseve creation for present or future generations.

As a youngster it was rare to see game animals ranchers realized as well as timber mineral people that in turn took care game animals aren't rare in fact the population of game has increased many many times to where it i rare not to see them.

In its so called natural state much country burned eliminating undesirable growth of water robbing plans and woody growth. Fire of course like livegiving water can be devastating. However generally control of undesirables has increased carrying capacity of the land private or federal. Water retained by man made reservoirs spring development reseeding of oil or mineral sites has been distribution for domestic and wildlife.

Realizing recreation has become a big business it has not contributed to facts or states. the developers of this country paid their own recreation with their own resources. Not that recreation is wrong, but who took care that recreation is possible. I do not believe it is continual to dry communities up with regulations that takes a tax base away what is good for a community is I believe what is good for the country.

I am seventy eight years of age born and live in Park and Hotspring all my life. The Indian saying of don't judge a person until you have walked a mile in his moccasins

Respectfully /s/ H. Curtis Larson

247

RECEIVED
APR 21 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

April 18, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

Although I now live in Colorado, I grew up in Rock Springs and Green River, Wyoming, and attended college in Laramie. My husband and I have spent many wonderful weeks enjoying the wilderness areas of northwest Wyoming. Therefore, what happens in these areas will always be of concern to us. Thus, the reason for writing is our serious concerns with the BLM Grass Creek Management Plan, especially since this area is an integral part of the Greater Yellowstone Ecosystem. The policy of elevating mineral development and commodity production over all other uses is intended to say the least. I would like to emphasize the following:

1. The BLM's proposal to open Wilderness Study Areas to hard rock minerals mining, motorized vehicle use, and oil and gas development is unacceptable. Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands wilderness study areas should be managed to retain their wilderness character.

2. The BLM should manage more of the Resource Area for semi-primitive, non-motorized recreation activities. The proposed resource management plan places unacceptable emphasis on providing motorized recreation activities. Less than 8% of the public lands within the resource area would be managed to provide for the kinds of activities many people enjoy the most, such as backcountry hunting and fishing, hiking, camping, wildlife watching, sightseeing, nature study, and opportunities for solitude in natural environments.

3. The BLM needs to provide greater protection for potential national natural landmarks. The Grass Creek Resource Area contains several candidate National Natural Landmarks, or NNLs. To protect these areas, oil and gas leasing and development and hard rock mining should be prohibited.

4. Areas of critical environmental concern in the Resource Area should be off limits to oil and gas leasing and development. The Federal Land Policy and Management Act requires the BLM to "give priority to the designation and protection of areas of critical environmental concern." I support the BLM's proposal to establish the Fifteenmile Creek, Westwater Draw, and Upper Owl Creek ACECs. These areas should be placed off limits to oil and gas leasing and mineral development. In addition, the extraordinary recreational and natural resource values of the Fifteenmile Creek

247.2

Watershed Area should be acknowledged and protected.

5. The South Fork of Owl Creek meets the criteria for a National Wild and Scenic River. The South Fork of Owl Creek is an outstanding river resource undeniably entitled to legal protection as a Wild and Scenic River. At the least, it deserves to be protected from development threats such as oil and gas leasing, roads, and mineral development along the river corridor.

6. Hard rock mineral withdrawals should be encouraged. I support the BLM's proposal to remove several important areas from mineral entry, but I also encourage the BLM to consider extending the proposed mineral withdrawal to the four existing BLM-designated Wilderness Study Areas in the planning area.

7. The proposal to allow oil and gas leasing and development of every single acre of legally-reclaimable public lands is clearly excessive and violates BLM's multiple use mandate. There is no mandate to lease everything as the BLM evidently claims. Multiple-use includes non-extractive uses such as protecting and managing wildlife habitat, maintaining healthy and functioning fisheries, protecting water quality and watersheds, providing opportunities for education and scientific research, recreation, and aesthetic values, and preserving important historic and cultural resources.

8. More attention needs to be given to improving the condition of riparian areas and rangeland. A more aggressive use of coordinated range management techniques coupled with time-controlled grazing practices would greatly improve ecosystem health and biodiversity.

9. The BLM should place a greater emphasis on managing fish and wildlife habitat. I support Alternative C which is the only alternative that provides adequate protection for all big game winter range and allows the expansion of wildlife and fish into high potential habitats.

In summary, I support Alternative C and hope that the BLM will also do so. This exceptional part of the Greater Yellowstone Ecosystem deserves better than leasing and development of the entire resource area.

Thank you for your attention to these comments.

Sincerely,

Patricia Kolm

[redacted]

cc: Governor Geringer, Sen. Simpson & Thomas, and Rep. Cubin

248

RECEIVED
APR 21 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

April 19, 1995

Mr. Bob Ross
BLM Team Leader
Box 119
Worland, WY 82401

Dear Mr. Ross:

We write today to urge a serious reconsideration by the BLM of its Draft Grass Creek Management Plan. We are very concerned about the overall loss of wildlife habitat and the generally unlimited opening of the area to unrestricted hard rock mining, motorized vehicle use, and oil and gas development.

Even the miniscule acreage designated as Wilderness Study Areas are to be open to the above-mentioned activities, much to their long-term detriment. We believe that Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw should be managed to retain their unique wilderness character. And, throughout the area there is too much emphasis on motorized recreation use. It is entirely possible that the WSA's will not ultimately receive that designation from Congress, in which case the opportunity for semi-wild experiences and solitude in a natural environment will be virtually non-existent.

We would also like to see special attention paid to the portions of the Grass Creek region with potential for designation as National Natural Landmarks. In addition, area of Critical Environmental Concern should be off limits to oil and gas leasing. They are simply too important in their present wild state to be sacrificed to industrial destruction. We would also encourage the withdrawal of significant segments of the lands under question from Hard Rock Mineral exploitation. The law is an antiquated rip-off of the American public and will result in irreparable harm to the area. Certainly the areas already removed from consideration by the BLM are a good first step, but much more needs to be done.

And finally we do not see anywhere near enough specific emphasis on maintaining a healthy habitat for fish and wildlife. The present language has many "escape clauses" which will allow future decision makers to weasel out of their responsibilities in this regard, and we urge this language to become very specific in terms of species diversity and overall healthy populations in the region. We believe only Alternative C meets the necessary obligations we know are necessary for the wildlife of the area.

We thank you for your time and consideration and hope you will take our concerns most seriously.

Sincerely,

Andy and Nancy Carson

RECEIVED
APR 21 1995
BUREAU OF LAND MANAGEMENT

249

April 20, 1995

Bob Ross, RMP Team Leader
Box119
Worland BLM, Worland, Wy.
82401-0119

Dear Sir:

I am writing this letter in reference to the Grass Creek Resource Area.

Much of the revenues in the four counties involved come from the oil industry. This would have a great impact on the people of these counties if severe restrictions on the oil and gas industry are placed in the Grass Creek area by the BLM.

There also appears to be a strong bias by the BLM against grazing by farmers and ranchers. It appears that land that is grazed is far healthier than lands that are left to the elements in the Grass Creek area.

We do not feel the Owl Creek area or Grass Creek in general could be considered a wilderness area. It is a semi-arid area, and I might add, similar to the rest of the state of Wyoming.

The BLM appears to be by-passing Congress in this administration, a reckless and deplorable situation on the lives of many people in our nation.

Sincerely,
Cal Rimel
Midge Rimel
Midge Rimel
[redacted]

RECEIVED
APR 21 1995
BUREAU OF LAND MANAGEMENT

250

NORTHWEST
WYOMING RESOURCE COUNCIL
P.O. Box 2685 Cody, Wyoming 82414

17 APR 95

Bob Ross
Worland Dist. Office, BLM
PO Box 119
Worland, WY 82401

Dear Bob:

As a member of the Park Co. Task Force reviewing the Grass Creek RMP draft EIS, I would like to compliment the BLM for this new approach to community involvement in the EIS process. I do think the process needs some democratic tunning however. The task force was nominated directly through the county commissioners, and they gave no public notice about the formation of a task force. The result was all but two members of the task force were members of the Park Co. Multiple Use Ass., and if it had not been for one of our members being on the Park Co. Planning and Zoning Commission, the task force would probably been all of their membership. I know it is not your function whom the county chooses for a task force, but you could democratize its formation by getting public notice that counties are being asked to form such groups. That would enable a petitioning of the County for more broad based representation on these groups, which I am sure you would agree would better serve the EIS process.

Sincerely,
Sean Sheehan
President

250.2

NORTHWEST
WYOMING RESOURCE COUNCIL
P.O. Box 2685 Cody, Wyoming 82414

April 15, 1995

Mark Sawyer
Park County Planner
1002 Sheridan Ave.
Cody, Wy 82414

Dear Mark:

We would like to thank you for the opportunity to participate on the Park Co. task force formed to present the BLM with comments on the draft EIS for the Grass Creek RMP. It was with regrettable conflicts of the demand of running my buisisness that I was unable to make all the meetings. I would like to offer you some comments on the selection of task force members, and of the comments presented team leader Bob Ross, of the BLM.

First the make up of the task force itself was far from representative of the make up of Park Co. It appeared of the members of the task force all except myself and Pete Bageley were members of the Park Co. Multiple Use Society, I think their entire board of directors was there. While I think it was appropriate for oil industry to be represented by their paid lobbyist Pat Childers, I think it was in appropriate for nonconsumptive resource users to be in such a minority.

Second in the comments offered by the task force to the commisioners I feel we did make some positive compromises, and come to some common agreement about changes in resource management that we felt the BLM needed to make. These were in order of listing in the comments letter. Fire Management, we all agreed that a burn policy related to the historical burn cycle needed to be implemented. (1)That fire was a critical part of the regions ecological health. (5)We agreed about the need for effective mngt. of ORVs, to include sanctions for violators. (8)We agreed about the need for better bottanical description of the listed plant communties by listing the species compositions involved. (10)We agreed we would like to see wild horses removed from

250.3

NORTHWEST
WYOMING RESOURCE COUNCIL
P.O. Box 2685 Cody, Wyoming 82414

the Grass Creek area and see the money and AUM dedicated to their management be used for native wildlife.

Areas where Pete Bagely, a Biology Instructor at North West College, and myself a wildlife biologist with 13 years field work disagreed strongly and do not see that disagreement reflected in the commissioners comments are: (2)Fish Habitat no one with biological experience or education would make a statement like this, the health of any stream or lake is directley related to the ecological health of the entire watershed it serves, any enhancement of a fisherie requires the enhancement of the environment the fish live in. (3)Forest Mngt, while forestry is the art of growing trees for wood, the science of forest ecology is nowhere complete enough to make statements about managing forest for overall biological productivity. Managing a forest stand for tree production alone is often done in disregard of other forest values, water, fisheries, and wildlife communities. Harvesting of timber should not be determined by a forestry definition of maturity. We also strongly objected to the harvesting of firewood along any waterways, desert or other wise. Dead trees standing and downed trees are crucial wildlife habitat, especially in riparian areas. (4)There was strong disagreement about the need for grazing reform areas of the Grass Creek RMP suffer form over grazing, WYO Game and Fish can name areas of concern, and a reduction of AUMs and rest from grazing are the only proven methods of rehabilitating stressed range. The Holistic Grazing method has been around since the early seventies, and has yet to produce a single successful result off of irrigated pastures. It has infact drawn a lot of negative criticism by range scientists. (6)We agree with BLM recommendations for no surface occupancy, but feel that there maybe some room for compromise based on new automated technologies and these need to be discussed on an individual basis. We are opposed to the commissioners recommendation of rejecting the no-surface occupancy and timing limitations. (9)While we agree the water dishcarges from oil fields in some instances is beneficial these waters, their volumes, qualities, and uses need to be better recognized and defined. (11)We strongly disagree with the pretect that the direction of wildlife herd mngt be done

250.4

NORTHWEST
WYOMING RESOURCE COUNCIL
P.O. Box 2885 Cody, Wyoming 82414

only with the agreement of live stock permittees. Hunting and huntable species are a vital part of the states economy, and in no way second in value to federally subsidized grazing on public lands. Any discussion of wildlife population targets must involve all affected parties and organizations.

Lastly a couple of points not mentioned by the commissioner that we thought important and that we had some degree of group agreement on. Sage Grouse, a bird characteristic of the region is in serious decline and in need of special attention in its habitat needs. Bighorn Sheep it is vitally important to maintain as much seperation as possible between Bighorn and domestic sheep. Big Horn Sheep have little immunity to common domestic sheep diseases, and contact with these diseases can result in losses of Big Horn lambs in excess of 95%. An ideal seperation would be 20 miles. In areas of public land use, Big Horn sheep are worth far more dollars to the states economy than domestic sheep and should be given preferance

Sincerely,

Sean Sheehan
President

RECEIVED
APR 2 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

251

April 19th, 1995

Bob Ross Team Leader:
C/O B.L.M., Worland,
Wyoming. 82401

Dear Bob Ross:

As one of many whom have been asked to write about this "Grass Creek" Resource Area, from my own direct knowledge I want to express a very deep concern over the manner this whole issue is being handeled. You and I both know the B.L.M. has no documentation which shows your agency has any right to Administrate or Jurisdict over any of our Wyoming Public Domain Lands. I have several letters from different heads of the Bureau, stating there is no document in possession of the B.L.M. which provides such rights as "To Administrate or JURISDICT" over our Wyoming Public Domain Lands. You people seem to think or believe if you can find some (so called authority) to Author several pages of retric which benefits the Bureau's position this should be excepted by the general public. Such shallow thinking is a norm for a large percentage of the "Public Servants" in the Bureau. The honest truth is when the big crunch comes and your overloaded Bureaucracy's Agencies will dump many thousands out in the Job Market who will finally be forced to face the truth, "What are they actually qualified for", and the answer has to be, possibly as highly skilled in an ability to distort the honest facts, and such skills have no value in the average workplace, where honesty and hard work with worthwhile skills are what is needed. The end of the Washington D.C. Bureaucratic Agencies is not to far off, and when our western states do take back our States Rights to administrate and Jurisdict over all lands within each States borders from the County level is fastly approaching the day of arrival.

Every one involved in the B.L.M. attempt will one day have to account for blind and deaf attitude which some of the 'Eastern Elitists once again believes it can cram down our throats - and we must except it. Our older residents are not able to write or answer there protest, I have talked to well over 25 or 30 who are unable to understand what could allow the B.L.M. to have any right to want to make such a radicle change, I agree with a strong "NO" to any change in the Grass Creek Resource Area. Just walk away quitely, your days are numbered, "Thank God for small favors."

Harvey J Eggerman
[redacted]

RECEIVED
APR 2 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

252

[redacted]
April 22, 1995

Bob Ross
BLM Team Leader
PO Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

I write in order to voice my concern about the Grass Creek Resource Area's draft management plan. This plan is of course controversial in that it has drawn criticism from both sides of the environmental battlefield. The BLM is to be commended for some of the proposed changes that have been made, in particular lowering the level of stocking on these federal lands.

However I have particular concerns about the future of the more wild areas in this study area, especially those that are currently designated wilderness study areas. These areas represent prime wild lands for our state, and provision needs to be made for their protection and preservation. I am particularly concerned about the Owl Creek, Red Butte, Sheep Mountain, and Bobcat draw badlands areas of this study plan. Whey should be set aside permanently and managed for semi-primitive non motorized recreation. It is extremely unfortunate that so few areas have been so designated, especially in the lower altitude basins in this state. Any argument that this some how interferes with personal freedom ignores the fact that there are many more places where those individuals can go for their recreation...not every single mile of the state needs to be open to these people and their destructive machines. Like many others, I enjoy back country hiking in remote quiet spots. With only 8% of the public lands in this area are currently managed for these activities.

Remember, once lost, Wilderness never returns. The land is our future, lets preserve it for tomorrow rather than destroy it for short term profits of large multinational interests who care neither for the state of Wyoming or the people who live here.

Sincerely yours,

Scott Bohle

253

Dear Bob Ross, Please designate Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands as wilderness. No oil, gas motorized vehicles. Wilderness is sharply diminishing - please save these areas.

Thanks,
/s/ Robert C. Murphy
4/20

RECEIVED
APR 2 4 1995
BUREAU OF LAND MANAGEMENT

254

Bob Ross
Team Leader
P. O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross,

It is unacceptable to me to have Wilderness Study Areas open to Hard Rock Minerals Mining, Motorized Vehicle use, and Oil and Gas Development.

I don't believe multiple use of public lands means cramming every possible public use onto every square inch of public land. Multiple use should include all types of multiple use, yes, but some areas for industrial development, some areas for primitive lands, some for recreation, some for agricultural uses and so on. Some areas can support several uses, but some areas are special and unique and need to be protected for the unique values of those lands.

Semi-Primitive and non motorized recreational activities are becoming fewer and fewer as those type of lands shrink due to politics and greed. Short term gains should not blind us to their long term value.

It is up to the agencies managing those lands to identify and protect those special values, even though public pressure is sometimes intimidating.

Areas of Critical Environmental Concern should be protected from development at this point. Until a value ethic develops where our society have a commitment to respect those areas, companies should not be trusted to operate there.

The BLM needs to take the initiative to improve riparian areas and rangeland conditions. Perhaps more lessees could be persuaded to participate in Stewardship programs like XRM or CRM's. Instead of being in the middle, BLM should take a proactive role in doing true ecosystem planning and stewardship with the users of the lands within their districts.

Sincerely,

Barbara Parsons

Barbara W. Parsons
[redacted]

255

B.L.M.
Bob Ross-Team Leader

Dear Sir

We protest against the proposed reduction in the Grass Creek Resource Area.

/s/ Charles & Mary Sheets
xxxxxxxxxxx
xxxxxxxxxxxxx
xxxxx

RECEIVED
APR 2 4 1995
BUREAU OF LAND MANAGEMENT

256

[redacted]
April 23, 1995

Bureau of Land Management
Worland District Office
Attn.: RMP Team Leader
PO Box 119
Worland, WY 82401

Ladies and Gentlemen,

In reply to the article appearing in the Northern Wyoming Daily News on April 20, 1995, it appears important that I write to you and ask you to log my position on the proposed Grass Creek Resource Area Management Plan.

Please see that this letter is logged as coming from a local resident, and that I am opposed to the reduction in AUM's of permitted livestock grazing. For details relating to my position, please see the attached transcription of my comments at the April 3 hearing.

Thank you.

Sincerely,

Lyle Spence

Lyle Spence

[redacted]

[redacted]

Please also note my membership affiliations.

256.2

Testimony of Lyle Spence at the Hearing on the proposed management plan for the Grass Creek Resource Area, April 3, 1995

Thank you for letting us speak, and thank you for hearing us. I want to speak to the appearance that any proposed management plan must be predisposed against agriculture and the livestock industry in particular. My point is it shouldn't be so predisposed.

My name is Lyle Spence, and I live in the city of Worland. I don't have an agricultural or mineral interest of any kind, and I don't hold any grazing permits. I am an avid outdoorsman, and my wife and I spend virtually all of our recreational time either hunting or fishing or otherwise enjoying the natural resources that are the subject of this hearing and this proposed management plan. I am telling you I have a very keen consumptive interest in the wildlife resources in question, and that is one of my qualifications for testifying here today.

I also speak from the informed source of my employment with Farm Credit Services, which is a lending institution that deals almost exclusively with farmers and ranchers. I personally administer loans to farmers and ranchers throughout Northwest Wyoming. These comments are my own, but are founded in part on the information I have through my employment.

The reason I am here is that I think there is an Area of Critical Economic Concern (ACEC) that is negatively impacted by this proposal, and that "ACEC" is the whole Grass Creek Resource Area. There is a species living throughout that area who's long term survivability is not adequately considered in this proposal. It's the species that manages the land and pays the taxes that build the roads and schools, and which supports the communities and industries that make this whole region habitable by all of us, and enjoyable to those who visit. That species is the agricultural producer.

In last year's hearing on Rangeland Reform 1994, I provided an example of a typical ranch family and their historical financial performance in order to highlight their vulnerability to either increased grazing fees or a reduction of grazing allotments. I offered to provide more examples for study by the BLM and the Department of Interior, but nobody asked for any more. In hopes that you are interested, I brought more with me today. I have in my hand a summary of a study of earnings efficiency of 18 ranch operations in Northwest Wyoming. Five of the 18 ranches summarized here graze livestock in the Grass Creek Resource Area. Now you may say that 18 ranches is not a lot, but those 18 ranches run 10,000 cows, and summarized here are a combined total of 65 years of income statements on those ranches. If my math is correct, this represents 37,000 cow years of financial performance data, all occurring in the 1990's. If I stacked those statements end-to-end they would reach 75 feet in the air, and that is probably taller than the tallest building in Worland, which just might be the BLM building. The point here is that this is a significant volume of data, and it's worth looking at.

256.3

Testimony on Grass Creek RA Management Plan, L. Spence, Page Two

This summary shows that on average, these ranches had an earnings efficiency ratio of 22%. What I mean by that is that for every dollar generated in revenue, they had 22 cents left after expenses were paid. With that 22 cents they had to feed their families, they had to pay their debts, including payments on their land, they had to replace their capital as it wore out, and they had to improve their land and grow their business if possible. Late relate this historical data to current economics.

Last Friday I participated in a Beef Industry Symposium in this very room. There were a number of very qualified speakers on various issues related to the future of the cattle industry, and it was highly educational. Incidentally, I don't remember seeing anybody there from the BLM. The consensus of all experts in the field was that the next several years are going to be very hard on the cattle industry from the standpoint of profitability. The fact is that the feeder cattle market today is 22% lower than it was a year ago. The fat cattle market today is 19% lower than it was a year ago. The costs of financing are 30 to 35% higher than they were a year ago. The outlook for the foreseeable future is that prices will remain at roughly these same levels. In order to succeed, most producers are going to have to find greater efficiencies, find new methods of reducing costs, and they cannot be hampered by resource reductions if they are to succeed.

These people's historical margin of 22 cents is gone for the foreseeable future due to market conditions. Remember, that's the money with which they feed their families, pay their lenders, replace their capital, improve their land and build their business. I am not here to press the panic button this year, because most producers have the financial resiliency to withstand these conditions for some period of time. But you have to deal with the reality that this industry so fundamental to our communities cannot bear any more burdens while these families try to adjust to the current and foreseeable economic environment.

The conclusion is inescapable that the economic burden of reduced AUM's is something these people just don't have the margin to cope with. They can't have this resource limitation forced upon them if we expect them to remain viable, and contribute to a viable agricultural community.

256.4

Testimony on Grass Creek RA Management Plan, L. Spence, Page Three

I want to close by asking you to do three things:

First, gather the data on this species I've been talking about, the agricultural producers. Figure out what influences their survival rate, and when makes them vulnerable to a decline in numbers. Believe that it's not that hard to do, because I've done it, and I am not very smart. I summarized 18 ranches between breakfast and lunch last Wednesday. It's probably easier than gathering data on the wildlife species that seem to be the focus of your concerns. I would invite anybody in this room to join with us in putting their data in this sample.

Second, I ask you to propose a resource management plan that realistically addresses the continuing viability of these agriculture producers.

Finally, recognize that the human ecology of our community deserves as least as much respect and as much study as the wildlife ecology, maybe even more.

Thank you.

257

BLM
Box 119
Worland, Wy 82401

Bob Ross - Team Leader:

The tax bases in the counties of Wy. are well worth protecting. Our taxes have gone up 24% in a very short time. Our natural resource based industries are very important in keeping our taxes in line, this also makes us a more inviting location for new businesses and homes. These things will help keep our children in Wy.

Please do not allow more restrictions to our public lands. We need industry for jobs and we need freedom to hunt and fish these lands. We need not to be priced off the lands we own by the officials we hire.

/s/ Josephine E. Layout
/s/ Vernon C. Layout
xxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxx

258

xxxxxxxxxxxx
xxxxxxx
April 21, 1995

Bureau of Land Management,
Worland District Office,
Attn Team Leader,

Dear Sir:

I have been following with inters -- and apprehension -- the discussions in the Northern Wyo. Daily News about the so-called Grasscreek Plan.

Yesterday's report about the number of letters received from far-away places really irritated me. Most of the people who support such radically environamental projects, plans, and changes, in the way Wyoming people do things and manage their businesses and economy have never been here

[page 2]

or perhaps in many cases have not even been west of the Mississipi.

I believe, from what I have been able to learn, that the Grasscreek plan would severely affect the economy of the big Horn Basin, and consequently of Wyoming, in an adverse way.

We have too much interference from Washington, D.C., and from environmentalists whose only thought is to promote their agendas. Of course, as has been pointed out, most of Wyoming's land belongs to the people. Why not let the people who know the conditions and problems of the area be the ones to determine the uses of said land?

Yours for a prosperous, well managed Wyoming.

/s/ June Gossens

RECEIVED
APR 24 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

259

April 18, 1995

Bob Ross, Team Leader
Bureau of Land Management
PO Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I urge you to insure that the Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas be protected from oil development.

All areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside the Wilderness Study Areas should be protected, as well.

I now live on the Central California coast. I have fond memories of traveling the areas mentioned, and hope to introduce travel to the grandchildren, as well.

We await your considered attention to this matter.

Sincerely,

David L. McKee

David L. McKee

260

Worland BLM, Bob Ross,
Team leader
Dear Sir

I object to absolutly no credit given to the technologies in any of the multiple use industries from which the environment benefits

I object to the loss of revenues to all four counties.

I object to a inadequate range of alternatives to choose from 71% of the statements comparing the alternatives, all read, same as preferred. This violates the environmental policy act.

Object to unreasonable restrictions on oil and gas industries No credits or value is given to wildlife habitat or water.

I object to any wilderness area restricting motorized recreation

/s/ Dave Bouma
One mad Wyo citizen

RECEIVED
APR 25 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

261

THE STATE OF WYOMING
Jim Geringer, Governor

Department of Commerce
Celeste Colgan, Director
Division of Cultural Resources

April 21, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

RE: Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (State IS No. 50-0014); SHPO #1291LB014

Dear Mr. Ross:

Staff of the Wyoming State Historic Preservation Office have reviewed the above referenced document as it pertains to cultural resources. A comprehensive cultural resource overview is presented and the Preferred Alternative includes a variety of mechanisms for the protection and preservation of archeological and historic sites.

We recommend that the viewsheds at the Legend Rock Petroglyph Site and the Hamsterian Draw Rock Art Area should be protected and preserved to the maximum extent possible. These sites are significant and have been contributing greatly to their cultural significance. In addition, we urge the Bureau of Land Management to carefully monitor visitation to these significant petroglyph sites. Experience has clearly shown that facilitated access generally leads to increased vandalism, and that substantial investment in security and protection measures, including restoration and rehabilitation measures may be required to ensure adverse effects do not occur.

References are made to the development of cultural resource interpretive sites and public education strategies. We support the Bureau of Land Management in its efforts to increase public awareness about the significance and fragility of cultural resources. We would be pleased to cooperate with the BLM in these efforts.

Please refer to SHPO project control number #1291LB014 on any future correspondence dealing with this project. If you have any questions contact James Bampton at 307-777-6292 or Judy Wolf, Deputy SHPO, at 307-777-6311.

Sincerely,

John T. Keck

John T. Keck
State Historic Preservation Officer

JTK:kk:rtw

cc: Wyoming State Clearinghouse, Office of the Governor, State Capitol Building, Cheyenne, WY 82002

State Historic Preservation Office
Barrett Building, 4th Floor, 2301 Central Avenue, Cheyenne, Wyoming 82002
(307) 777-7697 FAX (307) 777-6421

262

Dear Sir,

We are against new management of federal lands. Our taxes are high enough. We are against this new government proposal.

Thank you
Dale D. Spomer
/s/ Dale D Spomer
Joy J. Spomer
/s/ Joy J. Spomer

Hillberry Cattle Co.

RECEIVED
APR 25 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

P.O. BOX 628
RIVERTON, WY 82501

263
WE

To: Bureau of Land Management
Bob Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119

RE: Grass Creek EIS

The following are the questions and comments of the Hillberry Cattle Company.

The EIS proposed to cut the AUM's 25 to 35%. This will cost the U.S. Government 2 to 4 million dollars. How is this consistant with the FLPMA Act Sec. 102(a)(8) ?

The Taylor Grazing Act (TGA) requires the BLM to stabilize the livestock industry. The EIS, however, calls for a 25 to 35% cut in grazing. This can hardly be said to stabilize the livestock industry. Pursuant to the EIS, the BLM is placing a greater focus on wildlife production than it is on livestock production. This switch in management is not in compliance with the TGA.

The EIS will curtail oil, gas, & coal mining by the no visual occupancy. This will cost the U.S. Government millions of dollars. Does the BLM know what this cost will be? How is this consistant with the FLPMA Act Sec. 102(a)(8) ?

The BLM has not considered the economic effects of the EIS on one resource vs to another (Page 14). This is a flaw in the document. As the change from the present multiple use, to the restrained grazing, oil, & mining, in favor of wildlife. The EIS favors wildlife over any other use of the land. The EIS does not address the total economic damage it will do to the U.S. Government and the local governments, ie. counties, schools, and cities that depend on the taxes and Pilt monies. Will this be addressed before the final plan? What will be the dollar amount of the EIS on all concerned tax entities?

On page 50 the BLM proposes to do work on the range, (E. fence, reservoirs and springs). Several years ago the BLM tore down the sheep fence around the Hillberry Cattle allotment, and left alot of the fence lying around and didn't clean it up. Approximately 3 years ago the reservoir weshed out on the allotment. It has not been repaired yet. What is the BLM going to do about this?

The EIS will increase the Fifteen Mile Horse Herd and expand it's area from 82,000 acres by over 39,000 acres, while cutting AUM for livestock. This Horse Herd is in a critical environment (Map #1). This will in effect make Fifteen Mile into a quasi wilderness

263.2

of about 900 square miles. Is this consistant with the Horse & Burro Act? What are the reasons for limiting the AUM's on the allotment adjacent to the Horse Herd area? Is this consistant with Sec.201(a) of FLPMA ?

Most of the EIS is based on the visual resource management approach. This is a subjective view of the BLM employee while looking out the window of his pickup. How do you measure his opinion?

It is the view of the Hillberry Cattle Company that the EIS is so flawed that it should be completely redone. Also, the past management of the Horse Herd has not been satisfactory. They should be moved to McCullough Peak or Pryor Mountain, and out of the critical environment they are in. Has the BLM studied the feasibility of doing this?

The EIS forces cuts in livestock grazing that are not supported by scientific evidence as required under FLPMA and Public Rangelands Improvement Act (PRIA)

A 25 to 35% cut in AUM's will cause us and many other ranchers not to be able to operate at a profit, and may put some of us operating in the Grass Creek area out of business.

By using the EIS process to develop what amounts to allotment management plans (AMPs), the BLM is violating PRIA which requires AMPs to be developed in consultation, coordination and cooperation with the permittees.

The Grass Creek resource area as the EIS proposes is not in the best interest of the Hillberry Cattle Company or the other ranchers involved. Therefore, we ask that the EIS be redone or the last EIS be substituted in it's place, as it worked and everyone was satisfied. Is this possible?

Respectfully Submitted,

Darwin Hillberry
Hillberry Cattle Company
P.O. Box 628
Riverton, WY 82501

P.S. Please answer our questions before the EIS is approved.

cc: Barbara Cubin / U.S. Congress
Alan Simpson / U.S. Senate
Craig Thomas / U.S. Representative
Wyoming Governor Geringer
Frank Falen / Lawyer

RECEIVED
APR 25 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

264

LANGFORD KEITH, JR.
ATTORNEY AT LAW

April 20, 1995

Worland District BLM
Bob Ross
RMP Team Leader
P. O. Box 119
Worland, WY 82401-0119

Re: Grass Creek Draft EIS

Dear Mr. Ross:

I find the Grass Creek EIS to be severely flawed in most technical and specific areas, however, I will not try to delineate each specific area of concern at this time. More generally, I speak to the apparent philosophy behind the EIS.

In reading this document, I cannot escape the conclusion that it is based upon the assumption that more wildlife and more recreation at the expense of any commercial venture whatsoever is desirable. I know of no statute which gives rise to that concept, and I do not think that the Worland BLM Office has the authority, direct or implied, to make this kind of determination. Your own document provides that all major species of wildlife are increasing, and the trend in numbers is upward. It would therefore seem that the existing conditions is satisfactory. Your premise that commercial operation should be curtailed in order to further enhance wildlife, is a political decision beyond the scope of your authority.

I believe that your sweeping paintbrush approach to critical habitat designation is arbitrary and capricious. I seriously doubt that it can be supported when we get to court, and I further believe that it constitutes a taking of private property without just compensation. While I am sure you do not agree with this position, I assure you that we will test the court reaction if you proceed.

Sincerely,

Langford Keith, Jr.

LK/eb

265

23 April 95

Mr. Bob Ross
BLM Team Leader
Box 119
Worland Wyo. - 82401-0119

Dear Mr. Ross,

I am asking you to help keep our militant preservationists from damaging the mission and image of those of us who consider ourselves to be more moderate and rational environmentalists. We must draw boundaries to the "Yellowstone Ecosystem" somewhere north of Mexico, south of Canada and west of South Dakota and Nebraska! The hysterical "Biodiversity", "Friends of the Bow" etc. plus far too many employees of the NFWS, advocate preservation with no development and prefer stasis to economic productivity. I am a native Wyoming, nature lover, with an earth science (geology) education. The lack of scientific content in many of the militant criticisms, show that they are planning with their hearts (and their lawyers!) and not their heads!
[page 2]
If these ecoterrorists are able to turn our complete state into a national park, none of us will be able to live here unless we work for the NPS or USFWS! Please stick to your "Grass Creek Resource Area" plan and ignore the preservationists.

I am sure you have noticed that some of these folks practice pious dissimulation and will be like dogs, piss publish false "facts and figures" to support their own agenda!

I also support the BLM and believe that you have done a good job, considering the battle field of divergent views you have had to endure.

Sincerely,
/s/ Sanford G. Andrew
xxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxx

RECEIVED
APR 2 0 1995
BUREAU OF LAND MANAGEMENT
BRIDGER, WYOMING

266

MEL GINSBY, CDE

#26
c/o Bob Ross, Team Leader
P.O. Box 119
Worland, Wy. 82401-0119

Dear Mr. Ross:

By threatening economic access on public lands in the Grass Creek Resource Area of the Big Horn Basin you are threatening me and every other individual living in this part of the state in a very personal way. You propose to severely cut off a major source of revenue in our local tax base. With the limited population that we have, to lose a major source of revenue would be tantamount to a death certificate for the entire region. An increase in taxes to that extent would make it infeasible for businesses to function in an economically workable way. The low density of population in a large area accounts for part of this, but the lack of income which would be produced by public lands if they were privately owned is a staggering piece of the tax pie. To severely restrict the source of income represented by multiple uses of public land would destroy the businesses which would be forced to make up the difference. No money, no jobs, no economy, no schools, no hospitals, no law enforcement or public services. Wyoming has no interest in becoming a ghost town of empty houses so the rest of the nation can visit - on holidays and say, "How quaint. Isn't it cute?"

If there is a specific case of misuse or abuse in utilization of BLM land, be specific about trying to address that specific problem - looking for a mutual satisfaction involving a handshake and a pat on the back. I would think that any "reasonable" person or agency would want to develope healthy interaction instead of fomenting confrontation. The word is reasonable, not reactionary or extremist, or even dogmatic.

Sincerely,
Mel Ginsby
Mel Ginsby, CDE

RECEIVED
APR 2 0 1995
BUREAU OF LAND MANAGEMENT
BRIDGER, WYOMING

267

[redacted]

April 20, 1995

Mr. Bob Ross
BLM Team Leader
PO Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

I'm writing in response to the Bureau of Land Management's draft of the Grass Creek Management Plan. I understand that the plan is partly the result of the bombardment by various self-interest groups that would remove present environmental restrictions in the Grass Creek Resource Area.

A person who feels an area must be exploited to be appreciated is harboring a self-contradiction that can only be rectified through time and education. In the meantime, if we allow the whims of self interest to go unchecked, we not only delay and possibly prevent the learning experience, we destroy the catalyst that inspires it.

If Congress doesn't exhibit the foresight to designate Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands as wilderness, I only hope that the BLM can find it in their wisdom to maintain the wilderness character of these wilderness study areas. Further, if Congress fails in this attempt, I would like to see a change in the draft plan proposed by the BLM that currently would allow the areas to open up to motorized vehicle use, mining, oil and gas lease, road development and completely disallow any of these environmentally disturbing activities.

I would like the BLM to protect the Gooseberry Badlands, East Ridge - Fifteen Creek Badlands, and Tatman Mountain from oil and gas leasing and hard rock mining as potential National Natural Landmarks with a visual resources management classification of "VRM II." I'm pleased to know that the BLM proposes to establish Fifteenmile Creek as areas of critical environmental concern. I would also like these ACECs protected from any oil and gas leasing and mineral development. We should also consider the protection of the Fifteenmile Creek Watershed Area.

I believe the South Fork of Owl Creek meets the criteria as a National Wild and Scenic River and should be considered as such. Regardless of whether the South Fork of Owl Creek reaches this status or not, any oil and gas leasing, roads, and mineral development should be prohibited in the river corridor.

Concerning riparian areas and rangeland, I would like to see continual improvement not simply maintenance in the Grass Creek Resource Area. Large portions of rangeland and riparian zones are degraded and unhealthy. More

267.2

aggressive planning, technique, and coordination should be employed to improve the health of these areas.

Finally, the BLM's draft plan should not simply provide for and support habitat and wildlife populations only "to the extent possible," but should be in complete support of Alternative C that "allow[s] the expansion of wildlife and fish into high potential habitats."

Only when the last
tree has died
And the last river
been poisoned
And the last fish been
caught
Will we realize that
we cannot eat
money.

--19th Century Cree Indian Saying

Sincerely,
Robert E. Druchniak
Robert E. Druchniak

268

April 22, 1995

Dear Mr. Ross,

I want to express my concerns regarding the BLM's Grass Creek Management Plan.

The BLM's proposal to open wilderness study areas to hard rock mineral mining, motorized vehicle use, and oil and gas development is unacceptable.

The Grass Creek Resource Area is one area of beauty remaining to us. Please use your position to help ensure that it stays this way. We can't afford to lose this important wildlife habitat and primitive recreation area.

Sincerely,
/s/ Anna L. Stegemoeller

Anna Stegemoeller
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

RECEIVED
APR 27 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

SPIERING FARMS
1170 ROAD 19 STAR ROUTE
POWELL, WYOMING 82435
307-754-4349

269

April 25, 1995

Bob Ross RMP leader
Box 119
Worland WY. 82401-0119

RE: Grass Creek Resource Area Management Comments

The BLM's management plan for this area is totally unacceptable and in the future is going to cause a backlash that will be very detrimental to the objectives that the BLM is trying to achelve. When such a severe reduction is proposed to the uses of an area that supports a vast variety of economies it is time to stop and assess just who is behind it and what their real agenda is. This area and in fact all the west has been settled and maintained by the resources that could be utilized. This management plan is simply an effort to start the process of drying up the availability of resources and in the end the economic prosperity of our home state. This country has enough wilderness and protected areas already and what it needs is a strong economy so the people of this nation can afford to enjoy these areas.

I am totally opposed to any more protected areas, restrictions and attacks on our industries and way of life.

Thank you,

Kelly Spiering

Kelly Spiering

MARSH
GRASSES
SEEDLINGS

SEED
PRODUCTION
SPECIALISTS

270

Dear Mr. Ross:

No, No, No - We do not need Bruce Babbitt and his henchmen telling us what to do with our federal lands -

Good Grief - You live here in Wyoming, you must have friends and neighbors that need your protection - after all we all pay your wages -

I'm tired of people coming out here from everywhere else and telling us how what and why and we have absolutely no say in the matter -

All of a sudden the west is up for grabs (so they think) and all the rich play boys and their bunnies want to play cowboy -

Bull!

We haven't done a bad job in the past 61 yrs - and will do alright in the future but restricting people from federal lands is not the way -

Sincerely

/s/ Bill & Beverly Kolacny xxxxxxxxxxxxxxxxxxxxxxxx
(over please)

[page 2]
P.S.
I tried to be nice in voicing our opinion - how ever if we were to set down and talk you would be treated to coffee and a lot of finger baking & loud arguements

Also - here is one of our gripes -
Folks who live in the state of Wyo -- are entitled to hold BLM, Forest or State lands - However - foreign or out of state owners should not hold these lands -

RECEIVED
APR 28 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

WILLIAM H. PRICE II
TIMBER CREEK RANCH
17N RD 40A
CODY, WYOMING 82414
TEL (307) 527-7673
FAX (307) 527-7673

271

April 26, 1995

Mr. Bob Ross
Worland BLM
Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

We are writing to protest the proposed reduction of land use including potential limitations on oil and gas activities, ranching, etc. in the Grass Creek resource area.

If the proposal were to go through, it would have, in my opinion, a serious adverse impact on the tax base and hence, the tax income for the entire Big Horn basin.

For instance, I happen to be a trustee of West Park Hospital and as such am, of course, familiar with the financial aspects of the hospital. With a cut in the tax income the hospital and I am sure other tax-supported institutions would be in severe financial straits and may not be able to operate.

Yours truly,

W. H. Price II

WHP/sdp

RECEIVED
APR 28 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

WYOMING
GAME AND FISH DEPARTMENT

272

April 27, 1995

Bob Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119

Bob:

I would like to make a few comments on the draft EIS, concerning development of the Grass Creek RMP. As you well know, fisheries in the Grass Creek Resource Area are managed out of the Cody Regional Office. We have worked closely with BLM personnel in the past on aquatic habitat concerns and fisheries development and management. Hopefully, we can maintain this level of cooperation in the future to enhance fisheries in the Grass Creek Resource Area.

In general, we support the objectives and preferred alternatives relating to aquatic habitat and fisheries management. However, we question how the preferred alternatives will be implemented without an Aquatic Biologist on staff in the Worland Office. The objective under Wildlife and Fish Habitat Management is to "maintain or enhance wetland habitat for wildlife and fish...promote species diversity and allow the expansion of wildlife and fish where possible." The management stemes that numerous management plans included the Bernon and Reservoir Habitat management plans would be revised as necessary to conform with WGFD guidelines. Under Fish Habitat, the BLM would 1) cooperate with WGFD to install 2 fish-run pools for reservoirs, which could support fisheries and 2) cooperate to improve riparian areas, reservoirs, and streams to enhance fisheries potentials. The objectives and preferred alternatives to reach these objectives appear to be consistent with our fisheries management strategies. My question is, who will handle these aquatic considerations?

To my knowledge, there is no Aquatic biologist on staff for the Grass Creek Resource Area. In the past, we have dealt with Chet Wheelless on fisheries issues. However, I understand that Chet's title is Wildlife Biologist and that his duties are wide ranging (i.e. not entirely devoted to aquatic concerns). We would like to discuss common fish management objectives with regular Aquatic Biologist with the expertise and experience to handle aquatic habitat and fisheries issues, as well as the time to devote to aquatic concerns. Without this position I am afraid that your objectives will not be reached for several reasons: 1) lack of expertise to deal with aquatic issues, 2) lack of manpower to implement protection/maintain aquatic habitat, and 3) poor coordination with cooperating agencies (i.e. Game and Fish). We would strongly encourage that an Aquatic Biologist be retained on

272.2

staff to coordinate your aquatic habitat and fisheries programs.

We did find some minor errors in the document on page 149. Paragraph 3, Column 2 should be reworded in the following manner to eliminate these errors. Two Reservoirs on public lands in the planning area contain fish. Wardel Reservoir has been stocked in the past with walleye, but subsequent irrigation demands have reduced water levels in many years. Low water levels, resulting from the lack of a minimum pool agreement, have complicated fisheries management and reduced the success of these plants. Despite water level fluctuations, the reservoir continues to produce walleye and yellow perch, but at sub-optimal levels. The WGFD has terminated its stocking program until a minimum pool agreement can be negotiated.

In paragraph 4, column 2 delete the words and some walleye. The 1992 survey did not reveal that any walleye were present.

In the last paragraph, delete the words and bullheads. Although bullheads would survive and do well, we would not advocate stocking of this species.

I hope that these comments will help in the final formulation of the RMP. Please call if you have any questions or need additional information.

Sincerely,

Mike Walker

Mike Walker
Fisheries Biologist
WY Game & Fish Dept.
2820 State Hwy. 120
Cody, WY 82414
(527-7125)

273

April 27, 1995

Dear Mr Ross,

Iam against, the Bureau of Land Management's preferred Alternative for resource management in the Grass Creek Resource Area of the Big Horn Basin.

We need the oil & gas exploration, the mining & the timbering. To say the least, the ranchers need the grazing lands, so we "can all" survive.

Wyoming needs to keep the jobs, & the money they generate to keep this state alive & growing for generations to come.

Thank you for listening.

Sincerely
/s/ [Clysta] Bormuth
xxxxxxxxx

[EDITORIAL NOTE: Portion of signature illegible.]

274

April 24, 1995

Dear Sirs with the Team, and Bob Ross:

I am writing to urge you to make the following changes in the BLM's Bighorn Basin Plan.

Please protect the Absaroka Foothills, Badlands, Bighorn River & Red Canyon Creek Special Recreation Management Areas (SRMA) from any and all oil development. The Badlands SRMA should also be designated an ACEC because of its spectacular scenic and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas. Also please provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish those goals in the next five years.
thank you very much for your consideration in these matters.

/s/ Konrad N. Besch
xxxxxxxxxxxxxxxx
xxxxxxxxxx
xxxxxxxxxx

275

Dear Sir:

We do not want out side people telling us Wyoming natives what to do, how to do it and when.

Folks who live here have done real well for the past 100 years and, will continue to do so.

Federal lands are paid for by all the folks and we need multiple use for everyone - not just the rich.

One thing that needs to be done is the out siders who are coming in & buying big glocks of land need to have their grazing permits jerked

If they are not a full time resident no federal lands.

When I speak of resident I mean 25 yrs of continuous residence here in the state - These are the people you need to talke to and have serve on your committies! Native Wyoming it's!
If you listen to this and take my advice you'll be alright - Other wise you'll be on every Wyoming natives shit list.

Weve lots of good ideas and would like to voice them - How ever full time (18 hrs.) job prevents that. Put us on your list.

Bart Kolacny
/s/ Bart Kolacny 4/23/95
Loydrena Kolacny
/s/ Loydrena Kolacny

RECEIVED
APR 28 1995
BUREAU OF LAND MANAGEMENT
ROCK SPRINGS

276

To whom it may concern,

In review of the Green Creek Resource Area Resource Management Plan Draft EIS I have a few comments to make regarding the Area of Critical Environmental Concern, Wildlife management, and Grazing management.

First of all I just want to remind you that if an ACEC is created it will actually be a defacto wilderness area administered by the BLM and not Congress as the Wilderness law requires. In reading this document and talking to BLM employees it has been impressed upon me that this area is already being managed like an ACEC just without the title. With this in mind why should we put this area into an ACEC? In it no the BLM will have more leverage for implementing restrictions on there permittees! I truly hope not! It seems to me that the BASS reason for creating these ACEC is to reduce soil erosion. I think that anyone who has spent time in the Fifteen Mile drainage would agree with me when I say that most of the erosion is occurring as a geological/natural process regardless of grazing. It is hard to imagine this drainage as ever being a functional riparian area as described in the BLM-EIS. Along these lines in your list of alternatives I didn't see any referral to a change in grazing management to improve riparian habitat and decrease soil erosion. Possibly if you talked to the permittees in that area and got them to see their AUMs during the dormant months and gave them a price break since the quality of feed will be less and the increased possibility of them having to haul water. This would let the grass have all of the growing season until the nutrients returned to the root system for the winter time to rest and there would be a substantial amount of above ground biomass to trap soil sediment when runoff occurs. Any how it's ideas like this that I don't see in the DRP-EIS. Instead it's "kick an ACEC and then we can do whatever we want" instead of trying ways to work with everyone involved. Even think about using Coordinated Resource Management.

While reading this DRP-EIS I was specifically I have noticed a huge trend that basically says that everything has to be managed to benefit wildlife while taking away AUMs, O&G leases, Mining leases, and allowing only seasonal use on certain areas. Does the wildlife generate enough income to economically justify these huge reduction that are being suggested the "Preferred Alternative"? Is the BLM changing its priorities and devoting entirely way too much money to managing wildlife while at the same time decreasing grazing AUMs instead of maintaining ACHP? I hope that we are not seeing a radical change in the current BLM priorities. On page 350 you have a chart that is for Wildlife Habitat Meeting Desired Plant Community Objectives this chart basically says that what you want on BLM land is not for range land to reach a good or excellent state, or a return to climax community but instead you want the range to provide the best possible cover and forage for wildlife. This in itself is poor management to manage for the wildlife instead of the rangelands

276.2

for which they live upon. I think the BLM desperately needs to reevaluate the objectives concerning the wildlife management aspect of this RMP. Before long you'll be taking orders from the WY Game And Fish Dept(pg 59).

An across the board cut of 25% AUMs is one of the worst management techniques I have seen yet. The reasoning behind this data is horrible, I see no evidence of qualified field information in this RMP. Instead you give reasons for AUM cuts such as improvement of visual quality of lands, or to provide forage for wildlife and wild horses. There is no evidence of these rangelands being in such condition to grant the reduction of 25% of the available AUMs. It is obvious that if a permit is in poor condition that something needs to be done such as a different season of use, water improvements for better range utilization, fencing projects, or a reduction in AUMs but, an across the board cut is ridiculous!! What about the permitees that have signed on AMP that is functioning well? Permitees like myself which have a functioning AMP have already took large cuts in our AUMs and if more were to come I would certainly be out of business. Don't you feel that if you cancelled your across the board cut and worked with the permitees that alot more could be accomplished and there wouldn't be near the hard feelings that would occur otherwise? Just one final note, if a permitee takes non-use for a few years due to financial strains or their own concern for rangeland health is it right to take 25% of these AUMs away if the permitee is already doing the right thing when not being asked by the BLM to do this. In fact won't that leave an awful taste in the mouth of a permitee who thought he was doing right and trying to improve his range. So lets all try to get along by bashing things out instead of making hope and unnecessary decisions.

Thank you for your time. Sincerely,

Derek W. Slover
Slover Land & Cattle, LLC

RECEIVED
Wyoming State Legislature
ADM — 1.000
Capitol Building, Cheyenne, Wyoming 82002 / Telephone: 307 / 777-7881
APR 24 1995
BLM Rock Springs Office

277

Senate of the Legislature of Wyoming
REPRESENTATIVE JOHN DEWITT
House Speaker Pro Tem, Agriculture and Land Ownership
Joint Legislative Interim Committee on Appropriations

April 28, 1995

Mr. Bob Ross, RMP Team Leader
Worland BLM
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

Please accept the following remarks as my comments on the Draft RIS for the Green Creek Resource Area. As a state representative and a member of the Joint Appropriations Committee, I have studied the document from the perspective of Wyoming's interests in management of the Grass Creek area.

Alternatives presented in the Draft EIS leave this reader with the feeling that each was deliberately designed to be unacceptable in some respect. Certainly the "Preferred Alternative" is unacceptable in most respects:

1. It strikes hardest at oil and gas exploration and development when these activities are the least intrusive and possess the greatest potential for enhancing diversity of habitat. Has the Worland office of BLM completely ignored the significant improvements obtained in Oregon Basin through cooperation among Marathon Oil, Queen Ranches, and the Cody Resource Area BLM?

2. It continues the pretense of a "Wild Horse Herd" when any layman of long residence in the Big Horn Basin knows there is nothing distinctive about these horses except for those characteristics being promoted through BLM management practices. If you have any scientific or genetic evidence to present to the public that these "wild horses in the Grass Creek Resource Area" are not just descendants of draft and riding horses of early homesteaders, we may feel you are justified in assigning large areas for their protection.

3. It underminies basic elements in the economy of the Big Horn Basin (forest products, grazing, minerals) and provides little or nothing in return.

4. What in the world is behind the desire to create more "wilderness" in the least aesthetic area of the Big Horn Basin? Who or what causes the need for such a designation? How can the BLM assume a "Wilderness Management" stance on this area when there is no assurance what-so-ever that your recommendation will be approved by Congress? Is this an instance of Rule and Regulation replacing Law in this nation? In the Worland office of the BLM still oblivious to the anger show in this country in which recommendations advocating advocating everyone but BLM employees only add fuel and rationale to the party extremists on both sides?

In addition to being critical, I wish to commend the Draft EIS for its proactive recommendations to protect small but significant areas containing artifacts. Can we, as members of the public, assume that almost every square yard of the Grass Creek Resource Area has been observed by BLM personnel in preparing the Draft EIS? I'm troubled by the language of the narrative which uses "may," "might," "possibly" and other qualifiers which indicate lack of specifics as to what exists in the Grass Creek Resource Area.

Since it appears we have only the four (4) alternatives from which to choose, I am forced to recommend Alternative "B." Wyoming is struggling to maintain adequate services to its residents and the other three choices would more severely impact these efforts. If the "Preferred Alternative" is selected, can we be assured that those who make this decision will remain in Wyoming to assist in paying the significantly increased taxes which result from it? I ask this question because it appears that the Grass Creek Resource Area decision will set the course for other BLM administered areas in Wyoming.

Thank you for the opportunity to comment. Governor Geringer will likely ask for a delayed decision to permit elected commissioners of the four (4) counties affected to provide another alternative for consideration.

Sincerely,

John DeWitt

PATRICK PLASTICS

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

278

725 N. Locust Street
P.O. Box 29
Ottawa, Ohio 45875

Ph. 419 523 3727
Fax 419 523 4759
Direct Sales 419 523 4696

Patrick Plastics, Inc.

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

R.E. Grass Creek Resource Area Management Plan - D.E.I.S.

Dear Mr. Ross:

Management of our public lands and the unique quality of life found in the Grass Creek Resource Area are very important to the citizens of Wyoming and the Public. Therefore management of those lands must be flexible, founded on valid research, broadly considered, and provide for the maximum economic return for the Public.

The DEIS that is printed does not provide the consideration of sustaining the area at the present level of economic activity, custom, culture, livestock grazing, oil and gas development, recreation and timbering. Therefore I strongly urge you to reconsider the DEIS and provide the following in the final draft:

1. Allow increased timbering to utilize the existing 86% mature forest timber, utilizing various methods including selective cutting that will allow the maximum monetary return to the Government and local communities, wildlife protection and other recreation.

2. Expand the use of fire treatment in the entire resource area to a minimum of the average fire treatment of the past 5-10 years. (approximately 2000 acres)

3. Maintain the livestock grazing AUM'S as they are presently authorized for both the permitted aum's and actual use listed for 1990. Manage individual allotment on their own basis and not as a whole if there is a problem. You state "In general resource conditions on public lands in the planning area, including range vegetation, watershed and wildlife habitat are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced or that would warrant elimination of livestock grazing on public lands." Therefore, the proposed reductions of AUM's is NOT WARRANTED! Every effort should be made to keep ranching viable in the resource area.

PATRICK PLASTICS

278.2

4. Off Road Vehicle management must have a more clearly defined designation and have a strong enforcement program for violations. The present plan does not address this issue!

5. A predator control program must be developed and implemented for the resource area which considers livestock, wildlife and human beings. The program must consider the safety of the multiple users, and if necessary the predators should be removed or eliminated. Without such a program it will be almost impossible to expand the bird populations in the resource area.

6. The unreasonable restriction placed on the oil and gas industry in the preferred alternative should be eliminated. It appears the No Surface Occupancy and Controlled Surface Use are not warranted as these concerns are already covered by your standard lease agreement. These restrictions have an extremely severe impact on the economic stability of the area and affects revenues for the federal government, State of Wyoming and individual businesses and industries of the four counties involved with this resource area. We need to provide jobs not eliminate them!

7. Consideration and comments attempting to create more Wilderness without congressional consent is in violation of current laws; attempting to do so by declaration of the Areas of Critical Environmental Concern (ACEC) should be stricken from the document.

8. There is no valid reason to expand the Wild Horse Herd, which is now costing the taxpayers over $15 million dollars to administer the program per year. Your management should be to maintain the herd at the level of 100 horses as stated in your 1989 summary. Building roads into the area that is of such special environmental concern and expanding the number of horses is not a wise use of tax money!

9. Adequate alternatives have not been provided. 71% of the statements comparing alternatives all read "Same as Preferred." This is in violation of the National Environmental Policy Act (NEPA).

Mr. Ross, the DEIS as published is a clear attempt to reduce multiple use, particularly timbering, oil & gas development and livestock grazing. These are industries that provide significant

PATRICK PLASTICS

278.3

revenues to the entire area and the Government. By your own agency statement "the area is functioning rather well." Therefore, Mr Ross it should be your responsibility to develop a plan that maintains the resource area, that provides for enhancement of all multiple uses and not the economic degradation and disaster that the present plan proposes.

Please provide details of how you propose to incorporate these suggestions into the plan and bring some reasonableness to the DEIS.

Respectfully,

Thomas M. Patrick

BUREAU OF LAND MANAGE
WORLAND DISTRICT OFFICE
P.O. BOX 119
WORLAND WYO. 82401

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

279

C/O Bob Ross

Grass creek Resource area:

Here are some feelings and comments about our land in this area the wild life has run on this land for years, so why penalize the rancher by taking the AUMS away?

The rancher helps manage the wild life, by developing good water, feed salt and we know the wild life do eat the salt and feed.

If you get rid of the livestock it would bring in more predators, in this area

Some of your ideas do more harm than good when you turned the fox back in this area they killed off most of the Pheasant ,Rabbits and Sage chickens. So having more predators. is not a good idea.

There is no justification for cutting the AUM units per month the land is not over grazed!!

The main problem is in the years when we had a drought.That is not the rancher's fault.

We are the ones that lose in those years, because we pay the rent and can only run a sort time when there is no grass or little water.

Or maybe you should stand behind your lease, by guarantee that there is plenty of grass, and rain. We both know you can not control the weather ! Neither can we We just learn to adjust our lives to live in this country.

If we have to cut 35% of our AUM,s we will no longer be in business, then there is no need to have a BLM office or employees, you better think of things like that as well !!!!

most of the small towns in this area do depend on the ranch income, we pay a lot in taxes to the county and state and federal government Most of us buy feed , gas, and shop for our families in your towns, where will that money come from to support the towns merchants!??

We can tell you about the hunters that have destroyed, property and animals at our expense,

They shot holes in water tanks, so the wild life and stock could not drink, why?? who knows.

Why do they shoot holes in the B.L.M signs ?? or cut the wire on your fence when was the last time a BLM personnel came around your fence line who is the one to maintain your fence? We are the one,s that do the work.

JONES AND JONES RANCH

Dave C Jones
Jacques Jones
Everett Jones

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Paige and Shane Smith **280**

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

RE: Grass Creek Draft Management Plan

We are writing to express several concerns regarding the BLM's Draft Management Plan for the Grass Creek Resource Area. Our primary concern is that the BLM should be very selective when determining which portions of this Resource Area will be made available for oil and gas leasing and development. The following is stated in the Buffalo Resource Area's Lightning Coal Bed Methane E.A.

> "An oil and gas lease grants the lessee the right and privilege to drill for, mine, extract, remove and dispose of oil and gas deposits in the leased lands subject to the terms and conditions in the lease. Because the Secretary of the Interior has the authority and responsibility to protect the environment within federal oil and gas leases, restrictions are imposed on the lease terms." The E.A. provides further that stipulations may be put on a lease, however "none of the stipulations empower the Secretary of the Interior to deny all drilling activity because of environmental concerns."

These statements are truly a wakeup call to the reality associated with oil and gas leasing - once the lines of approval are drawn on the map, its a done deal. Therefore, we recommend, at a minimum, that the following areas be excluded from leasing:

Owl Creek WSA
Sheep Mountain WSA
Red Butte WSA
Robert Drew Badlands WSA
Gooseberry Badlands NNL
East Ridge-Fifteenmile Creek Badlands NNL
Tatman Mountain NNL
Fifteenmile Creek Watershed ACEC
Mortenson Draw ACEC
Upper Owl Creek ACEC
South Fork of Owl Creek river corridor

These areas have already been identified by the BLM for their unique qualities. Therefore, it seems counterproductive to even consider having leasing applications submitted for them. An

280.2

inordinate amount of time would then be spent by BLM employees and a concerned public trying to determine all stipulations needed to attempt to minimize impacts from exploration and production within these areas. Even then, there are no guarantees that the stipulations will protect the areas from permanent alteration.

In addition, we recommend that the BLM give more specific consideration to ensuring that this plan actually enhances wildlife habitat by adopting Alternative C.

Thank you for the opportunity to comment.

Sincerely,

Paige Smith

Paige Smith

Shane Smith

CAMENZIND PRODUCTIONS **281**

Franz J. Camenzind, Ph. D.
P. O. Box 118
Jackson, Wyoming 83001
(307) 733-4806

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

April 20, 1995

Mr. Bob Ross
BLM Team Leader
P. O. Box 119
Worland, WYO.
82401

Dear Mr. Ross,

Please accept these comments as a response to the current BLM Grass Creek Management Plan.

I support Alternative 'C' for the protection of wildlife resources in the Plan. But beyond that, the Proposals to open up virtually every acre of the Unit to oil, gas and hard rock leasing is absolutely unacceptable. None of the Wilderness study areas should be touched, regardless of their final designation, but to do so before their status is determined is a mockery of the intent and purpose of wilderness study and designation legislation.

In addition, no more areas should be opened to roadways and off road vehicle use. The vast majority of Wyoming's public lands are already open to vehicles, to open more is contrary to the concept of multiple use. There has to remain a few desert environments free of vehicles where individuals can still recreate in the peace and quiet of nature. And in so providing, we also insure habitat for Wyoming's unparalleled wildlife populations- probably our greatest long-term assets.

There is too much critical wildlife habitat in this area to jeopardize it with extractive uses and permanent vehicular access routes. Lets save some of the Old Wyoming before it all looks like a RV recreation site or oil or gas field.

Thank you for considering these comments.

Sincerely,
Franz J. Camenzind, Ph.D.

P.O. Box 118 • Jackson, Wyoming 83001 • USA • (307) 733-4806

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

282

4/23/95

Bureau of Land Management
Worland, Wyoming
P.O. Box 119
Worland, Wyo. 82401

RE: Grass Creek Alternatives
Comments

Dear Mr. Ross:

I have been associated with the above mentioned area for the last 25 years in the capacity of a Agricultural real estate appraiser for a lending company. It has been my privilege to work with some of the finest people in the West over these years. They are those who provide food and fiber for this country and most of the world.

At the time I started with the above mentioned company in Worland, the BLM office here in Worland had 3 field technicians plus 2 or 4 office personnel on their staff. In contrast the Company I worked for covered the entire Big Horn Basin as well as Fremont Co. with the same sized staff as is being this 40 year period.

Records indicate that the farmers and ranchers of the U.S.A. have increased over times for themselves plus 40 other people. Every time a new official with in terms has of productivity 75 people go hungry world wide.

At this time in our culture recent history since it made sacrifice to protect the rights of that big time that I put elsewhere. That is the last thing that we need is little point is to add land to the life. The restrictive emotional environmental groups and politicians in connection with the management of land and forest lands have blown the problems completely out of proportion.

The many years that I have been associated with this area for about 40 years I have seen the wildlife population in Bighorn Basin and Fremont have been significantly into larger more complete operations being owned and managed by skilled agriculturalist. Bighorn Basin has mainly raised these specializations. The remaining as people are fully competent to manage land based on life highest and best use. Wildlife population is dependent of management of land. I would like to point out that the management efficiency equals resources wildlife problems are being solved. Wildlife is a resource the manner in which our farmers and ranchers have handled this situation shows a remarkable amount of compassion, and I hope with the help of the agriculturalist of other counties that conditions can be improved.

Further in with instar I alluded to the fact that 50 people rely on the farmer or rancher for their food supply. Can you imagine what could happen if suddenly the agricultural industry was so short that lack of wildlife and provide no food or fiber in the country. Well, this is the situation that exists in many parts of California due hugs development by BLM. The BLM turned the irrigation on these productive, this frequently the fine lands are productive enough.

Whether you refer like it or not, you are in the middle of this fight of land values the ecological aspects etc. As far as I am concerned I couldn't care less if I never see another wolf, coyote, bear, badger, skunk, cougar, black footed ferret among other so called endangered species. Our game animals of course can be managed by hunting and can be inventively introduced like the road travel.

282.2

In summary we in Agriculture are in direct confrontation with those who would never log a tree, preserve everything that is on this earth. There is no way that this can be done. I would like you folks to continue to work out a practical program with our agricultural people that will insure that our people in this country and the world will have a adequate diet to sustain themselves. PEOPLE FIRST- predators and endangered species second.

Sincerely,

Donald E. Becker
A Concerned Citizen

CC: When A Few Goes Haywire
(Readers Digest)

[Included with this letter was an article from the Readers Digest.-ED.]

283

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
RIVERSIDE, WYOMING

WILLIAM J. MILLER

April 28, 1995

Mr. Bob Ross
Bureau of Land Management
P. O. Box 119
Worland, WY 82401

RE: Grass Creek Resource Area

Dear Mr. Ross:

Please accept my compliments on the draft management plan for the referenced area. Although I do not agree with all aspects of the plan, for instance the designation of the Areas of Critical Environmental Concern and the limitation on off-road vehicle use, I believe you have achieved a reasonable balance for resource management in most of the plan.

It is worth noting that in dealing with natural resource issues, you have not simply taken a position to satisfy the "environmental community," but have recognized that there are other members of the "public" that also have interests and rights in the public lands. Many times it is easy to forget that public lands are for the public and are to be managed for multiple use, not for the single minded agenda of a well funded few who have no appreciation or understanding of the fundamental needs and requirements of all of the people of the American west, be they the rancher, farmer, miner, recreationist, hunter, miner, conservationist, etc.

Please continue to recognize the importance of the local community in your consideration of comments and observations on your management plan. These people are the true stewards and custodians of this land and resource, and in the vast majority of cases have done a good job.

Special interests, whether they are environmental groups or natural resource users, cannot be allowed to have greater influence than the local community simply because they have bigger budgets.

Sincerely,

William J. Miller

WJM/pisk

284

Pamela Perry [redacted]

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

3/28/95

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

Dear Mr. Ross:

I am concerned about the Bureau of Land Management's recently released draft management plan for the Grass Creek Resource Area of the Bighorn Basin. I am vigorously opposed to the plan's allowance for virtually uncontrolled oil and gas development in this beautiful region.

Specifically, I urge you to make the following changes:

The Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek Special Recreation Management Areas (SRMA) should be protected from oil development.

The Badlands SRMA should also be designated an Area of Critical Environmental Concern because of its spectacular scenery and extremely fragile soils.

Protect all areas included in the Conservationists' Alternative to the BLM's Wilderness Proposal including lands outside Wilderness Study Areas.

Provide more definite goals to address the problems of overgrazing in the resource area, and provide a timeline to accomplish these goals in the next five years.

Thank you for your attention to this.

Sincerely,

Pamela Perry

285

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT
RIVERSIDE, WYOMING

Mr. Bob Ross
BLM Team Leader
P. O. Box 119
Worland, WY 82401-0119

April 28 1995

Dear Mr. Ross:

I understand the management plan for the Grass Creek area falls far short of protecting some of the most interesting and unique areas in the state.

The Grass Creek area affords some opportunities to protect wildlife and resources for future generations to enjoy and utilize but only if these areas are managed and monitored properly now. This includes not only the scenery and habitat but also priceless natural landmarks and ancient geological features which need protection from oil and gas exploration and production and uncontrolled use.

Those areas of critical concerns should be withdrawn from exploration for oil and gas, hard rock mining and unmonitored land use.

I urge you to consider and incorporate the following major concerns in your plans.

* Provide greater protection for potential national natural landmarks.
* Protect areas of critical environmental concern from oil and gas leasing and development.
* Include the South Fork of Owl Creek in the recommendation for wild and scenic rivers.
* Withdraw hard rock mineral development in critical areas.
* Restrict oil and gas leases and development to proper multiple use criteria.
* Improve range and riparian areas.
* Manage and monitor with increased emphasis the fish and wildlife habitats.

Please take whatever actions available to you to protect this critical area while there is still something to protect. Do not let this area be destroyed.

Sincerely,

Charles H. Nations
[redacted]
(formerly of Lander, WY)

286

Grass Creek Resource Area

I support Alternative C. Minerals including oil & gas should not be depleted -- no even sought -- until our countrymen stop wasting them! Recreation motors should be banned! Overgrazing -- especially along streams -- & overharvesting of timber should be banned!

Respectfully, /s/ Bob Morris, xxxxxx xxxxxxxx

287

RECEIVED
WY 1 1995
BUREAU OF LAND MANAGEMENT

A A Production, Inc

2857 74th St. Lubbock Texas 79423-1433 (806)745-8655

April 25, 1995

Mr. Bob Ross-Team Leader
Bureau of Land Management (BLM)
Grass Creek Resource Area
P.O. Box 119
Worland, WY 82401-0119

Re: Written Response to Grass Creek Resource Area Draft Resource Management Plan (RMP) and Environmental Impact Statement Dated September, 1994.

Dear Mr. Ross:

A A Production, Inc. (A A) of the letterhead address is submitting it's written comments on the subject RMP. A A is committed to the protection of the ecosystem and environment of the RMP area. We look forward to cooperating with the BLM and the public to continue this commitment.

A A instructs the BLM to turn down all alternatives (A through D) and to return the RMP back to committee. While sympathetic with other industries concerns, this recommendation is based on the following, but not all, views from an oil and gas company perspective.

1. The plan is not "balanced" as the BLM asserts. Economic development does not an ecosystem destroy. It will be very costly to the petroleum industry in terms of jobs and asset value loss to increase the current onerous regulatory environment. The RMP yields too much to requests by environmental organizations for unrealistic regulation recommendations.

2. The RMP would encourage Canadian gas imports exempt from Canadian federal environmental regulations and Mexican gas imports also exempt from environmental regulations with the result of increasing environmental degradation of the world.

3. The RMP's merits should not be discussed with industry in short hearings. The committee or team that constructs the RMP should include contracted experienced and recognized petroleum industry consulting petroleum engineers, landmen, geophysicists, geologists, planners, and field supervisors to work with the existing environmental specialists that were used. The scoping statement was not sent to A A or its predecessors.

4. The RMP does not contain enough scientific data. Specifically, petroleum entrapment concepts do not include hydrodynamic or "basin-centered" concepts. Thus, the area considered prospective for natural gas development is too small. Also, the projections for well drilling do not take into account larger recoverable resource estimates and larger projections for future drilling that are publicly available.

287.2

Attached to this letter, A A's comments are further listed in the following exhibits:

Exhibit I: National and International Economic Impacts of the RMP
Exhibit II: Local Economic Impacts of the RMP
Exhibit III: Specific Recommendations for the BLM for reconstructing the RMP

Natural gas is a major fuel consumed by the United States (U.S.) and the entire world. In the U.S. it is used in most homes, schools, businesses, and factories and is increasing in use as a vehicle fuel. It's advantages are that natural gas is perhaps the most efficient, clean burning, and transportable of all fuels. In the U.S. and in Western Wyoming it is very abundant and easily extractable. Curiously, the U.S. displays a "self flagillative" attitude towards domestic natural gas as the U.S. encourages imports from Canada satisfying 12% of national consumption (soon to be 15%). The Federal government is now looking at encouraging Mexican imports of natural gas. The U.S. Federal Energy Regulatory Commission hampers natural gas transportation while the Canadian Government augments the cost of transportation of Canadian imports.

Locally, in the western half of Wyoming, population is on the rise. This population growth encourages additional consumption of natural gas. The proved reserves in the RMP area are on the decline. If increased natural gas demand is not met with increased Wyoming proved natural gas reserves then this demand will likely be met by Canadian imports. The current triple blows of rapidly declining spot gas prices, rapidly increasing Canadian gas imports, and sharply increased environmental regulations will probably prove further crippling to the domestic industry. A A is highly impacted by the BLM regulation in the RMP area as this area may become uneconomic for consideration as a "corporate growth" area. A A's sole business is natural gas production and sales.

We look forward to cooperating with the BLM in achieving a high degree of ecosystem protection. We ask the BLM to consider carefully our enclosed comments.

Very Truly Yours,

Don Greenwood
Manager of Geology

cc: Karen Kennedy
Wyoming Independent Producers Association
P.O. Box 2325
Gillette, WY 82717

Alex Woodruff
Independent Petroleum Association of Mountain States
620 Denver Club Bldg., 518 17th Street
Denver, CO 80202-4167

[Included with this letter were copies of pages from the *World Oil*, the *RMOI*, the *Well Servicing*, the *Odessa American*, and the *Oil & Gas Journal*.--ED.

287.3

EXHIBIT I
NATIONAL AND INTERNATIONAL IMPACTS OF THE RMP

THE RMP IN COMBINATION WITH OTHER RMPs' ...

- Encourages imports of natural gas exempt from environmental regulations.
- Degrades the world environment.
- Increases the Federal Deficit.
- Decreases new technology development for more efficient natural gas reserve extraction.
- Decreases the number of higher paying skilled jobs in America.
- Reduces the number of students in American Universities.
- Reduces the total federal tax collections.
- Reduces private investment in the U.S.
- Accelerates the decline of U.S. proved natural gas reserves.
- Increases Federal Bureaucracy.
- Increases the ratio of federal employees supported by private sector employed citizens.
- Discourages new business formation in the natural gas industry.
- Increases the distance and danger of natural gas transportation from source to consumption.
- Decreases the immediate availability of natural fuel supply during future international crises.
- Adds unnecessary regulation to an already high degree of environmental regulation.
- Causes the country to become more socialistic and less democratic.
- Transfers more well drilling decisions from private corporations to the Federal Government.
- Encourages ignorance of published reports detailing large gas resources available in the Western U.S. for development.

1

287.4

EXHIBIT II
LOCAL IMPACTS OF THE RMP

The RMP...

- Reduces the value of oil and natural gas assets in the RMP area.
- Reduces the funds available for environmental remediation in the RMP area.
- Weakens the natural gas businesses operating in the RMP area.
- Reduces the number of private sector jobs in the RMP area to offset the cost of new regulations.
- Increases the number of federal government jobs.
- Reduces travel, hotel, restaurant, and college business in the RMP area.
- Lessens the amount of immediately available natural gas for rising consumption.
- Diverts more private sector attention from improved natural gas development technology to being devoted to BLM communications.
- Causes much more pipe and electrical line miles per individual well.
- Increases the "crowding" in existing pipe and electrical line corridors.

2

287.5

EXHIBIT III
SPECIFIC RECOMMENDATIONS FOR THE RMP

The BLM is directed to...

- Return the RMP "back to committee" for further "balancing" of ecosystem and public needs.
- Recruit private sector gas industry consultants with each having a minimum of 15 years in private sector oil and gas well drilling experience. Include the following specialties: Petroleum engineer, petroleum landman, pipeline engineer, petroleum planner, petroleum geologist, production foreman, oilfield contractor, and petroleum environmental consultant.
- Share Environmental Coalition and Sierra Club complaints with IPAMS, RMOGA, RMAG, SPE, WIPA, and service company and oil and gas company volunteers.
- Similar to TIPRO (Texas Independent Producers Royalty Organization) convene an annual "retreat" once a year with environmental special interest groups volunteers and industry volunteers to discuss issues.
- Meet with "like" governmental regulatory departments of Canada and Mexico in the field to develop similar environmental regulations for oil and gas production (create "a level playing field").
- Implore the Secretary of the Department of Interior, a cabinet member, to recommend to the President and Congress to halt imports to the U.S. of oil and gas that does not meet similar environmental regulatory standards to U.S.regulations.
- Rely on projections for development of natural gas in the RMP and how that natural gas is trapped on studies conducted and published by The United States Geological Survey (also in the Department of Interior). The U.S.G.S. has studied the Green River Basin far longer and has more resources for studying the Green River than the BLM.

3

288

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT

[redacted]
April 20, 1995

Bureau of Land Management
Box 119
Worland, WY 82401-0119

Attn: Bob Ross, Team Leader
Grass Creek Resource Area RMP EIS draft

Dear Mr. Ross:

As a native of Wyoming (68 years' worth), and a Park Co. resident for almost forty years. I feel qualified to offer my opinion regarding the above-named draft proposal that involves such a vast area of northwest Wyoming, if for no other reason than longevity.

I would like to urge you and your co-drafters to try to maintain the status quo, as far as use by the people of Wyoming for grazing, oil, gas and possible other mineral development. Wyoming/citizens/a great economic need for these uses, and have improved their care of the environment over the last twenty years tremendously.

I realize that these are public lands, but do not concede that they belong to citizens for no other reasons than recreation or protection of wild life and environment. Wyoming ranchers have long been caratakers of the land and wild life, having a far greater incentive to take good care.

Yours truly,

Dorothy Dixon

289

RECEIVED
MAY - 1 1995
BUREAU OF LAND MANAGEMENT

April 27, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
Box 119
Worland, WY 82401-0119

Dear Mr. Ross: RE: Grass Creek Resource Area

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belongs to our state as well. Prudent management of our resources is sound business practice and our businesses operate with that in mind. We have managed the affairs of our state quite well.

This plan does not consider the needs of the citizens or businesses of Wyoming.

I oppose this document in its entirety.

Additional comments:

Signed: [signature]
Address: [redacted]
City, State & ZIP: [redacted]

290

RECEIVED
MAY - 1 1995
BUREAU OF LAND MGMT.
WORLAND, WYOMING

April 28, 1995

Attn: RMP Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wy 82401

Dear Ladies and Gentlemen:

First of all, I would like this to be recorded as being opposed to the grazing reduction that is proposed through the Grass Creek Resource Area.

The following are my reasons for being against such proposed reduction.

1. I have had the privilege of doing ranch appraisals in this area for 20 years. I have seen the good years with abundance of moisture and then followed by some years of drought. This land responds to moisture and it is innocuitable to say that one can project into the future and derive at a predetermined amount of same. I would agree there have been isolated instances where the land had been overgrazed, but these are minor and can be corrected with individual operators versus making across the board cuts.

2. The wildlife has not declined from range conditions, in fact, for most species they have improved. Wildlife is not the reason to be cutting same. I cherish the wildlife population of Wyoming. I cannot visualize this plan improving the wildlife populations. For this matter, why should the populations of wildlife be increased when they are in balance at this time.

3. By reducing same, you are taking the life blood away from the rancher. The only thing he can sell is livestock which is utilizing the range forage. When the forage is reduced, his income is reduced and his ability to withstand the economic cycles is diminished. I believe when the economic viability is reduced for the rancher, he will be forced to sell his ranch to someone else. This will lead to the rancher from overuse grazing by wildlife as needed lands in order to conserve the production for his livestock. In other words, the wintering of deer and elk herds on outdoor lands will be greatly reduced or eliminated. What rather? It will be there same wildlife that you are trying to increase. The winter feed won't be available for them.

4. We have seen the land ownership change over the past 5-7 years to more consolidated units. The ranches and farm units are getting larger and the smaller units are being absorbed. When this occurs, there will be fewer people controlling how needed land will be used. They will have the authority to control large blocks of land or use whatever means available to them to restrict access, restrict grazing of wildlife, or whatever agenda they consider viable to them. By making the proposed reductions, you are adding fuel to the fire and reducing the economic life blood of the smaller ranching family to survive. Eventually, they will be forced to sell out to the larger and more control oriented operators. This will be doing the opposite of what you visualize this plan is inclined to accomplish.

290.2

Bureau of Land Management
April 28, 1995
Page - 2

5. Incentives should be given the rancher to develop water to better utilize the existing forage. I have seen areas in this state where water has been piped to the ridges where livestock do not graze. Since the pipeline was constructed, livestock are utilizing these areas and there is less pressure on the lower riparian areas.

6. I would like to see more individual management plans developed versus making a broad management plan for the entire area. More cooperation is needed and less confrontation.

Very truly yours,

Rick Six

291

Dear Mr. Ross,

I am against, the Bureau of Land Management's preferred alternative for resource management in the Grass Creek Resource Area of the Big Horn Basin.

I was under, the evidently mistaken impression, we were all pulling together, to develop more oil & Gas exploration, so we would never be at the mercy of foreign Countries again.

Mining & Timbering is also big issues here, to say the least.

How about the high cost to the ranchers for lease grazing? They have had to reduce their herd sizes to compensate. This is going to result in higher prices in the markets. People cant afford the prices now, let alone when they rise.

Wyoming needs to keep the jobs, and the money they generate, to keep this state alive & growing, for generations to come.

Thank you for listening

Sincerely,

/s/ Donna Dugger

292

April 29, 1995

Dear Mr. Ross,

I am against the Bureau of Land Management's preferred alternative for resource management in the Grass Creek Resource Area of the Big Horn Basin.

We need the Oil & Gas exploration, the mining & timbering. The ranchers are already paying higher grazing fees, which is not right.

Wyoming needs to keep the jobs, & the money they generate, to keep the State of Wyoming, alive & growing for generations to come.

Thank you for listening.

Sincerely,

/s/ Jim Dugger

RECEIVED
MAY - 2 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

293

CODY LUMBER, INC.
P.O. Box 757
Cody, Wyoming
82414

FAX-307-527-6318 PHONE 307 527-7193

4-28-95

Mr. Bob Ross
Team Leader
P.O. Box 119
Worland, Wy 82401-0119

Dear Bob:

The following are my comments on the Grass Creek Resource Area DEIS:

Page 24--Management objectives: The chosen words used under the preferred alternative are quite good. However, the last sentence at this point has little real meaning and will continue to have little real meaning until someone defines eco-system management principles in a way that is not only understandable by natural resource scientists, but also by the public at large.

The management objectives for alternatives B and C imply a far more restrictive image than what would be possible in everyday implementation, and as a minimum should be reworded to imply emphasis.

Overall, if the Bureau is genuinely sincere in managing to accomplish the stated objective of managing to "---enhance the health and productivity ---" of the forested ecosystems, then certainly a very much more vigorous program must be implemented than what is shown for any of the stated alternatives.

Page 132--"General Factors. The forest land as a whole is not producing up to capability because of stagnation, insect and disease problems, old age, and overall declining condition of the stands."

The above statement states the problems clearly and concisely, and should likewise become the principle motivational factor for determining treatment alternatives, all of which should be implemented rather quickly if objective satisfaction is to be realized.

293.2

CODY LUMBER, INC.
P.O. Box 757
Cody, Wyoming
82414

FAX-307-527-6318 PHONE-307-527-7193

Mr. Bob Ross Page #2 4-28-95

However a quick review of table 19, page 196 indicates that little action will be taken, even under alternative B which is the most ambitious of the four alternatives presented. Under the preferred alternative at the end of calendar year 2005 (10 years hence) 300 acres of mature and overmature forest will be converted to young forests. At this rate, 30 acres per year, 403 years would pass before the 12,100 acres of mature and overmature timber would be converted under the preferred alternative. This surely cannot be considered "preferred" forest management!!! Alternative B, the most aggressive alternative, would require 93 years to convert the mature and overmature forest to a young forest, clearly unacceptable.

Clearly, the objectives for forest management in this document are relatively sound. The treatments discussed are appropriate for the species of concern. The application and implementation of sound silvicultural principles fall far short of a satisfactory solution to the problems identified for the existing commercial forest lands.

If our fundamental purpose is truly to make our forests permanently useful to mankind, then we must do a much better job of choosing and carrying out the treatments most appropriate to the conditions prevailing within our commercial forest lands.

Sincerely,

Charles L. Wright
Forester

RECEIVED
MAY - 2 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

294

To BLM C/O Bob Ross
Grass Creek Area Draft Eis
P.O. Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

294.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

295

April 27, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, WY 82401-0119

RE: Grass Creek Resource Area

Dear Mr. Ross:

The purpose of this letter is to oppose more restrictions on Wyoming's public lands. Your document is filled with restrictions that your agency is not authorized to impose. We speak with the authority of the Constitution of the United States of America and that of the great state of Wyoming.

The resources in Wyoming belong to Wyoming, and therefore, the control and usage of our land belongs to our state as well. Prudent management of our resources is sound business practice and our businesses operate with that in mind. We have managed the affairs of our state quite well.

This plan does not consider the needs of the citizens or businesses of Wyoming.

I oppose this document in its entirety.

Additional Comments:

We need to Get these Environmentalists & Recreationist Educated to who is Supporting Them. There is no one that would have anything if it weren't for agriculture.

Signed: /s/ Geo. Ellis
Address: xxxxxxxxxxxxxxxxx
City, State & ZIP: xxxxxxxxxxxxxxxxx

296

LOVELL AREA CHAMBER of COMMERCE

Wyoming's Bear City

RECEIVED
MAY - 2 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

P.O. Box 196
LOVELL, WYOMING 82431
(307) 548-2217

May 1, 1995

Bob Ross, RMP Team Leader
Worland District BLM
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

The Lovell Area Chamber of Commerce Board of Directors is concerned with the Grass Creek Resource Management Plan. The Agriculture and the Livestock industry are essential to the economy of Wyoming. The dollars generated from one business to another are overwhelming.

According to the 1991 University of Wyoming study, "Impact of Agriculture on Wyoming's Economy" by Robert Fletcher, David T. Taylor and Brett Moline, agriculture contributes $1.4 billion to the state's economy. Eighty-two percent of all Wyoming agriculture revenues are derived from the livestock industry. Cutting back of grazing permits will have a drastic effect on Wyoming's agricultural economy.

Forty-nine percent of the total oil production in Big Horn County is mined from federal lands. The revenues received from oil and gas leases are a mainstay for local economy and school funding.

The Lovell Area Chamber Board of Directors would ask that the Grass Creek Resource Management Plan take these facts and many others under consideration.

Sincerely,
/s/ Fritz Crane
Jack Nicholson
Chamber President

297

5-2-95

Dear Mr Ross,

Please allow me to list my thoughts regarding the Grass Creek Management Plan; (I am a frequent visitor to many of the Grass Creek sections.)

1. BLM needs to continue its aggressive management toward restoration of plans and animals, and protection of watersheds.
2. I would like BLM to provide for wildlife as written in Alternative C.
3. I believe the paleontological expanse has yet to be realized within this Resource Area. Any mining, gas-oil development, increase in roads would be a geological crime.
4. I support your 3 ACEC's but these must be off limits to industrial leasings/development. The values of the Fifteenmile Creek Watershed Area - if protected - could be an example to the rest of the state.

In summary, I request that the Grass Creek Management Plan exclude any type of industrial development, road enhancement, and NOT yield to the multiple-use extremists who are wanting wyoming to become a sovereign State.

Sincerely
/s/ Fran Childers

1804 Hwy 14
Shell, WY 82441

298

RECEIVED
MAY - 2 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Randall R. Taylor
[redacted]

01 May 1995

Mr. Bob Ross, Team Leader
U.S. Bureau of Land Management
P.O. Box 119
Worland, WY 82401-0119

Subject: Comments on Grass Creek Resource Management Plan Draft EIS

Dear Mr. Ross and Members of the Planning Team:

Please consider the following comments on the Grass Creek Draft Management Plan.

I believe the BLM has performed a good job in developing the EIS. There will always be some negative publicity from any plan. I hope the top managers can use sound criteria in preserving our long term resources and not be swayed by short term pressures. Where ongoing changes in public grazing policy need to be phased over a period of time to give ranchers time to make adjustments in their operations. Grazing policy needs to be developed in cooperation with lessees to take advantage of their input and to work with them in preserving resources. Through this cooperation the value of wildlife habitat and preservation of resources must be given the prime consideration that is past due.

The management of off road motor vehicles needs to be highly restrictive to prevent damage to resources, reduction of wildlife habitat, and to preserve the outdoor experience that people leave the towns to experience. Motor vehicle road tracks, the roar of engines, and damage to vegetation should be appropriately delegated to areas least impacted by these activities; they should not be a part of the majority of the BLM lands in the Grass Creek Resource Area.

Off road vehicle management needs to be a combination of Alternatives A and C. Maintain closure of OHVs in the wilderness study areas, and limit all other OHV use to a few designated roads other than the open area near Worland.

Limiting to designated roads (rather than existing roads and trails) is a key issue that will make enforcement more feasible. In light of the explosion in off road vehicles, additional attention is critically needed to prevent abuses.

On a permanent basis over-the-snow vehicles need to have the same requirements and limitations as all other vehicles. Wintertime wildlife harassment or use of these vehicles for hunting simply cannot be tolerated.

298.2

Managing suitable areas for bighorn sheep habitat is an essential part of a responsible plan. Your efforts in this matter are appreciated. Cooperation with other involved agencies in this matter is of prime importance.

Management of deer, elk, and moose habitat needs to follow alternative C in so far as this can be worked out in a cooperative manner with land owners and grazing leasees in the area.

Acquiring water wells and developing other water sources is an example the BLM's responsible exercise of their mandated stewardship. I agree that many roads and trails need to be closed to motorized vehicles to protect watersheds.

In regard to management of the wildhorse herd, I see modest benefit at a severe cost. These animals are hard on the range that could be more beneficially used by wildlife and livestock. We already have an abundance of wildhorses; I cannot see this as a priority, especially considering the cost.

I strongly support the plans to negotiate land exchanges to enhance wildlife habitat in the upper Owl, Cottonwood, Gooseberry, and Grass Creek drainages. One consideration is that private holdings have often served as sanctuaries for wildlife because of the protection offered. Care must be taken to limit motorized access to these areas.

The upper Owl Creek area needs to have the ACEC designation to allow for better protection of the resources in this area.

In the management of wildlife, soil and water, vegetation, and scenic resources, as summarized in Table 3, page 83 of the EIS and as shown on Map 14, the preferred alternative needs to include more of the acreage exempt from surface-disturbing activities included in Alternative C. A melding of these alternatives is needed.

In the management of fires, consideration should be given to allowing the natural plant succession that comes from fires, while saving money on fire control.

I completely disagree with the classification of "semiprimitive motorized" recreation use. There is nothing semiprimitive about people running around our public land areas on four-wheelers and motorcycles; rather these represent the epitome of man's threat to natural areas.

The 603,150 acres available for "semiprimitive motorized" listed on page 120 is an abuse of public lands, and constitutes the greatest threat we currently have to deal with on public lands.

298.3

Efforts to expand aspen stands are greatly appreciated.

Thank you for your efforts in this important work. There are many people who support and appreciate your work.

Sincerely,

Randall R. Taylor

299

XXXXXXXXXXX
April 27, 1995

BLM.
To whom it may concern:

You have asked for comments about "The Grass Creek Resource Management plan". It seems the plan has been drawn up without any thought or input of the people it will directly affect.

I feel the people of the area so designated as Grass Creek should be directly involved in making any decisions of the area in question

The plan as presently written is unacceptable to my way of thinking.

Sincerely
/s/ Shirley M Brown

300

RECEIVED
MAY - 2 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Carroll E. Brown
[redacted]

4-15-95

Bureau of Land Management
101 S. 23rd.
Worland, Wyoming

To whom it may concern:

It is my understanding you have asked for public input con-cerning The Grass Creek Resource Management Plan.

My personal feelings are, as presently written, it should be scrapped! And I really do not care for Senator Simpson's remark that we, as voters might as well like it because we can't do anythang about it.

I realize you have no control of the senator's statements but I do feel such statements do reflect the general feeling bureau-crats and politicians have about their constituents.

If the Grass Creek area is in need of revision of its management, then the people directly affected should be the ones that have the opportunity of making the major decisions concerning that management!

Sincerely yours,

Carroll L. Brown

RECEIVED
MAY - 4 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

301

Texaco Exploration and Production Inc

P.O. Box 49825
Denver CO 80249-9825
4601 DTC Boulevard
Denver CO 80237

RE: Grass Creek RMP/DEIS
Worland District, Wyoming

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401-9671

Dear Mr. Ross:

Having reviewed the Grass Creek Draft Environmental Impact Statement [DEIS] and Resource Management Plan [RMP], Texaco offers the following comments:

- Texaco supports Alternative B in the DEIS as the best management approach for the Grass Creek Resource Area. This approach would rely primarily on standard lease terms and conditions for protection of wildlife and other sensitive values. Adequate resource protection would be provided while allowing optimum opportunities for exploration and development.
- We oppose BLM's Preferred Alternative. This approach would double the use of restrictive lease stipulations. The DEIS fails to demonstrate the need for increased restrictions or that less restrictive measures were considered but found insufficient. Nor does the DEIS adequately consider use of mitigation. This would significantly reduce environmental impacts resulting from oil and gas activities.
- A section should be added to the Appendix that would describe the various lease stipulations, parameters of their use, and conditions under which waivers, exceptions or modifications may be granted. This should be standard format and will provide greater predictability to operators.
- Through the use of Conditional Surface Use [CSU] stipulations, BLM would place seasonal restrictions on operation and maintenance of production facilities. This new CSU stipulation would be used on 61,900 acres of winter range, lambing areas and migration corridors. Texaco fails to see how additional security for big game and their predators is adequate justification for such restrictions. Mitigation measures could reduce the impact on wildlife and eliminate need for seasonal restrictions. If facilities are shut down in winter months this will lead to lost production and revenues. Reservoirs would be damaged, increasing workover activity, operating cost and delays.
- The Preferred Alternative would limit surface disturbance to less than 20% in sage grouse habitat. There is no basis for such restrictions. Nor does BLM discuss the current condition of sage grouse habitat or reasons for population declines. What impact do other surface activities have on habitat [e.g., recreation, grazing]? Why focus solely on oil and gas development? That issue should be addressed on a case by case basis, not through automatic thresholds.
- Many of the proposed ACEC's have significant potential for oil and gas development. Such designation could negatively affect opportunities for such development. The BLM should document how these proposed ACEC's meet designation criteria under BLM Manual Section 1613. If such criteria are met, perhaps ACEC designations are unnecessary.

301.2

- Geologic information used in the DEIS to develop the reasonably foreseeable development scenario should be updated. Information that reflects industry's focus on gas development in recent years should be incorporated.
- Existing lease rights must be recognized. Old leases with standards terms will not be subject to seasonal restrictions exceeding 60 days unless BLM proves oil and gas development will cause "undue degradation" to the environment.
- BLM indicates in the RMP/DEIS that historic resources in ten oil and gas fields, including Little Grass Creek, would be managed for scientific and public use. This program would purportedly improve knowledge of the historic significance of fields and facilitate approval of future development and reclamation activities. In July, 1994 the Petroleum Association of Wyoming [PAW] posed several questions regarding this program:

  1. How does BLM justify this misdication of time and resources when areas such as southwest Wyoming are in desperate need of arch surveys for APD's, rights-of-ways, etc.?
  2. Explain the need for examining these fields for listing.
  3. Clarify the benefits derived from listing these fields. Would there be any incentive to spur operator participation? How would designations affect post-production abandonment procedures?
  4. How will BLM handle consultation under Section 106 of the National Historic Preservation Act [NHPA] to consider effects of undertakings on listed districts, sites, etc. when proposed operations are similar in scope to prior operations? Will BLM impose restrictions that inhibit an operator's ability to replace or update old equipment, or to pursue new technology which might extend production?

  Apparently BLM has failed to respond to PAW's questions. Texaco would not support this proposed program without knowing what BLM response to these questions would be.
- It does not appear that the Section on socio-economic benefits of oil and gas development was a significant factor in developing BLM's Preferred Alternative. BLM should document the cost of administering the minerals program along with industry's financial contribution to local, state and federal treasuries. "Net" risks to the environment from oil and gas activity should be assessed after considering avoidance and mitigation. The cost of increased restrictions on oil and gas operators should be weighed against benefits derived.

Texaco appreciates this opportunity to comment.

Very truly yours,

Terry Belton
Land Representative

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

302

BLM
c/o Bob Ross
Grass Creek Area Draft RIS
P. O. Box 119
Worland, WY 82401-0119

Dear Sir:

I am writing in reference to the Grass Creek Area Resource Management Plan Draft RIS comment period which ends May 7, 1995.

Attached is a copy of a message sent to all employees of Marathon Oil Company in Cody, Wyoming. As an employee of Marathon, I find this tactic offensive and manipulative. Many of the people who signed and mailed this form letter have not even read the Draft RIS. The preface to this form letter contains inaccuracies and misrepresentations which is typical of the propaganda utilized various Multiple Use committees and their branch sub-committees. It is unfortunate that so many people can be persuaded by such a committee which in time will undermine the very principles and values these people think they are supporting.

I do not agree with this in principle or in content and am embarrassed by this willful manipulation by the Marathon employee(s) who drafted this form letter and accompanying message. I am further embarrassed by the number of grammatical errors which in my mind detract from the intelligence of the author and those who sign their names to this form letter and would be inclined to discredit their input from consideration.

There are many residents in Cody, including Marathon employees, who do not agree with this viewpoint and who support the Grass Creek Area Draft RIS. I would like my voice to be counted as one of those in favor of the restrictions as outlined in this RIS.

Sincerely,

NAME WITHHELD BY
REQUEST

[EDITORIAL NOTE: This letter is printed without attachment.]

303

April 29, 1995
PO Box 3271
Laramie, WY 82071
William L. Baker

Bob Ross
BLM Team Leader
P O Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

I am writing to protest the appalling draft Grass Creek Management Plan. It is most important to me that you refocus the plan to place more emphasis on "ecosystem management" meaning you think first about the health of the ecosystems you are directed to manage. I cannot see where you have thought first about the health of any of the ecosystems in the Grass Creek Area.

Opening nearly all areas to oil and gas development, taking meager steps to restore overgrazed rangelands, emphasizing motorized recreation and hard rock mining, and failing to designated a comprehensive network of fully-protected Research Natural Areas are all signs of business-as-usual in BLM management.

Step into the present and give us a plan with more than lip-service to your real charge - to serve more than the extractive resource industries-to serve a broad public and the ecosystems themselves.

Sincerely,

/s/ William L. Baker

RECEIVED
MAY - 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

304

Curtis C. Parsons
P. O. Box 117
Big Piney, Wyoming 83113
(307) 276-3332 - Office of (307) 276-3382 - Home

May 1, 1995

Mr. Bob Ross, RMP Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

RE: Grass Creek RMP

Please register my objections to the Grass Creek Resource Management Plan and associated draft EIS. The restrictions being placed on oil and gas leasing and field operations are not consistent with good multiple use practice and will serve to reduce income both to the Federal Government and the state of Wyoming. The proposed NSO area is particularly troublesome. This has the practical effect of withdrawing these lands from oil and gas leasing for a very specialized use and appears to be an effort to create a quasi-wilderness designation simply to keep out oil and gas operations.

Until the state of Wyoming is able to substantially broaden its economic base, we simply cannot afford further restrictions on oil and gas leasing.

Sincerely,

CC Parsons

Curtis C. Parsons

CCP/rgt

cc: File

RECEIVED
MAY - 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

305

Jack Van Baalen
[redacted]

April 28, 1995

Mr. Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

This letter addresses the proposed management plan for the Grass Creek Resource Area. As you know, this area constitutes an integral portion of the Greater Yellowstone Ecosystem. For this reason the plan is critical to the continued integrity of one of the nation's most valuable natural areas. While the BLM is to be commended for some of its proposals, others are totally unacceptable, at least in their present form. This plan is even more critical in view of the fact that it will govern the management of the resource area for the next 10 to fifteen years.

The following must be considered in connection with the proposed plan:

1. Present proposals to open wilderness study areas to mining, motorized vehicle traffic and oil and gas development are so extensive as to be totally unacceptable. At a minimum, Owl Creek, Sheep Mountain, Red Butte and Bobcat Draw Badlands wilderness study areas should be managed to retain their wilderness character. This is essential even if Congress should decide against wilderness designation for these areas. Whether or not these areas are designated wilderness, they are so spectacular that they should be permanently placed off limits to mining, oil and gas development and motorized vehicle traffic.

2. The areas which the proposed plan intends to manage for semi-private, nonmotorized recreation activities are wholly inadequate. Even though demand for these kinds of areas is predicted to rise markedly, only about 8% of the public lands in the Resource Area are to be managed to provide hiking, camping wildlife viewing, nature study and solitude. It is crucial that the areas devoted to these uses be significantly expanded. Furthermore, if Congress should elect not to designate all the present study areas as wilderness -- a result which seems likely at this time -- the importance of managing these areas for semi private, nonmotorized use will be even greater.

3. One of the most shocking and surprising aspects of the proposed plan is its allowance of oil and gas leasing and development on every last acre of available public lands. Not only is this patently excessive, but it clearly violates the

305.2

Bureau's multiple use mandate.

4. There are several areas of critical environmental concern in the Resource Area. All of these should be off limits to oil and gas leasing and development. The BLM is to be commended for its proposal to designate Fifteenmile Creek., Meeteetse Draw and Upper Owl Creek as areas of critical environmental concern. However, it is essential that these areas also be off limits to oil and gas leasing and mineral development. Furthermore Fifteenmile Creek Watershed Area must be protected to maintain its extraordinary recreational and natural resource values.

5. The South Fork of Owl Creek certainly is eligible for Wild and Scenic River treatment. Your determination to the contrary is erroneous. It should be reversed and this extraordinary waterway should be accorded the legal protection which it clearly deserves. Even if it is not granted this deserved designation, it must nevertheless be protected from the devastating incursion of oil and gas leasing, roads and mineral development generally.

6. The proposal to close a few areas to mining and mineral entry under the archaic 1982 Mining Law is also commendable. Nevertheless, there are other areas which must be similarly protected against mining activities. All four of the existing Wilderness Study Areas must be protected against mining and mineral entry.

7. In view of the proposal's assessment that only about one-half of the riparian habitat in the area is properly functioning, it is difficult to comprehend why virtually no attention is to be directed at improving the condition of this habitat. More attention to riparian habitat improvement is required. Moreover, the plan's apparent lack of provision for improvement of large areas of degraded and abused rangeland is also beyond understanding. While recent improvements in grazing practices are gratifying, the Bureau should nevertheless institute more aggressive use of coordinated range management techniques together with time controlled grazing practices to improve ecosystem health and biodiversity.

8. The attempts to condition adequate management of fish and wildlife habitat by such qualifiers as "to the extent possible" and "where appropriate" are inappropriate. These important values should be fully recognized and pursued with all necessary vigor. Only the wildlife prescriptions of Alternative C of the proposed plan incorporate the requirements that should constitute the final plan's minimum wildlife objectives.

305.3

I trust that you will find the above comments useful. Please advise me with respect to further developments in regard to the management plan.

Yours,

Jack Van Baalen

Jack Van Baalen

RECEIVED
MAY - 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND DISTRICT

306

Bob Ross C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland WY 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each Allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the Various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

306.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstanciated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

May 02 1995 10:05 AM P.01 TERRYS HARDS INC

RECEIVED
MAY - 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND DISTRICT

307

May 2, 1995

Terry Collins

Worland BLM
ATTN: Mr. Bob Ross, RMP Team Leader
Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

I am very concerned about some of the management options being considered for the Grass Creek Resource Area. It seems that most of these options will seriously impact oil / gas and mushing operations that have been in place for decades. Both industries have proven to be good stewards of the land and this planned cut back of their activities is a real slam to their integrity as well as a devastating economic slam to the area economy. Just where are we supposed to make up the significant revenues that will be lost if the "preferred alternative" is implemented. Are we really willing to put the important mineral revenues that make up the bulk of funding for educating your children and mine on the sacrificial altar of yet more wilderness areas.

Mr. Ross, I was born and raised in this area and have a real love for it. The last thing I want to see happen is to have anybody ruin it. The industries that currently utilize this area have done an excellent job of promoting water and wildlife habitat in conjunction with their use of the land. It does not seem fair to not give some credit and consideration here. What is of even greater concern is that as much of the preservation movement is based out in the western states being most affected, but in the big moneyed eastern states. They do not have a clue (or concern) about how their directives will affect those that have to live with them. I seriously doubt they are willing to bail us out of the ensuing economic hardships.

Thank you for giving me an opportunity to "vent." Please use some common sense in determining the future management of this area. There is some middle ground to be found, but it hasn't been indicated in the current management proposals.

Respectfully,

Terry Collins

308

3-May-95

Bob Ross (BLM)

We have lived & raised our children in the Big Horn Basin I have been here 50 years.
I wish our public lands to be just that public lands.
We don't need the restriction & we do not need new management.
In Grass Creek or anywhere.

/s/ Sharon Hallman
Everett Hallman
Sandra Hollman

RECEIVED
MAY -2 1995
BUREAU OF LAND MANAGEMENT
DIRECTOR'S OFFICE

309

C/O Bob Ross
Grass Creek Area Draft EIS
Box 119
Hardland Wy 82401-0119
FAX (307) 347-6198

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area NOW. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

309.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferances, and prairie dog- Black-footed ferret inferences.

Bob Ross

RECEIVED
MAY -2 1995
BUREAU OF LAND MANAGEMENT
DIRECTOR'S OFFICE

310

C/O Bob Ross
Grass Creek Area Draft EIS
Box 119
Hardland Wy 82401-0119
Fax (307) 347-6198

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area NOW. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

310.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferances, and prairie dog- Black-footed ferret inferences.

Bob Ross 5/3/95

311

May 2, 1995

Worland BLM
Bob Ross, RMP Team Leader
Box 119
Worland, WY 82401-0119

Dear Mr. Ross;

The proposed management plan for the Grass Creek Resource Area contains aspects that I am against.

I oppose the Plan's obvious disregard of the past and present benefits brought to the area by multiple use management. The local counties surrounding the resource area stand to lose a substantial amount of revenue under the Preferred Alternative. Reduced grazing, unreasonable restrictions on the oil and gas industry and increased limitations on motorized recreation are all moves in the wrong direction.

The BLm should not manage Grass Creek RIsource ARea as an unofficial wilderness area. Please keep common sense a main
[page 2]
ingredient in your management plan by encouraging multiple use activities and doing away with excessive restrictions on the resource area.

Thank you.

Sincerely,

/s/ Linda Tokarczyk
XXXXXXXXXXXXXX
XXXXXXXXXXXXXXX

312

RECEIVED
MAY - 4
BUREAU OF LAND MGT.

Wyoming Wilderness Association

PO Box 260
Story, WY 82842
(307) 683-2842

May 2, 1995

Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross,

Please accept these comments from the Wyoming Wilderness Association (WWA) on the Grass Creek Resource Area draft management plan.

The Bighorn Basin is a treasured and unique area in Wyoming that contains a multitude of non-consumptive resources that will require careful management and protection. The Grass Creek RA specifically has some of the best examples of badlands, rock art, and ecological transition zones - from desert to high alpine forest.

Red Butte Wilderness Study Area, Sheep Mountain WSA, Bobcat Draw WSA, and Owl Creek WSA are all under the management of the Grass Creek RA. These areas -- whether recommended by the BLM or not for wilderness designation -- should be protected for their wildlife and primitive resources. The Citizens Wilderness Proposal for Wyoming BLM Lands not only recommends additional areas for wilderness designation, but expands the boundaries to include and protect ecosystems. Ecosystem management, a mandated management format for the BLM, recognizes wilderness as a vital component of any effort to achieve healthy functioning ecosystems. Wilderness provides the anchor that must hold the ecosystem together as the BLM works to restore and heal the damage wrought on our deserts, forest and watersheds.

It is ludicrous that the draft management plan's alternative contain only alternatives for 100% oil and gas development. Surely, there are areas that must be set aside from a 4 g development for some of the other multiple uses such as foot, horse and wheelchair travel, hunting and fishing, camping, non-motorized boating, outfitting and guiding, scientific study, educational programs, archeologic and paleologic study and exploration, photography, livestock grazing, wildlife and plant habitat.

Potential for oil and gas exploration in areas set aside as WSAs is the 1980's, is low to moderate, with development impossible due to the great depth of reserves and no Surface Occupancy stipulations on steep slopes (BLM 1990). Wilderness and special values would be eliminated or greatly impaired should oil and gas development or exploration occur within one mile of the WSA's or other special resource areas.

312.2

Owl Creek WSA provides crucial habitat for bighorn sheep, moose, mule deer and elk. The Harlequin duck (candidate for federal listing) occurs in the area. Two of the area's streams are important fisheries for rainbow, brook and Yellowstone cutthroat trout. The area also contains many rare and unique plant species that will require special protective management. The Citizens' Proposal has included sections of BLM lands containing Castle Rocks and other areas to protect a more contiguous and interesting ecosystem pushing the proposal to nearly 9,000 acres.

Bobcat Draw WSA, the only area recommended for wilderness designation by the BLM-Grass Creek RA, but the boundaries fell short of protecting entire ecosystems of the East Ridge Area and the Big Draw area. The Citizens Proposal recommends the extension of wilderness designation to include nearly 30,000 acres providing protection for colorful badlands sited by the National Park Service as potential National Natural Landmarks, the most comprehensive vertebrate fossil station of any rock in the world, crucial habitat for mule deer, golden eagles and sage grouse.

Sheep Mountain WSA, not recommended by the BLM, has been recommended by the Citizens' Proposal for approximately 24,000 acres. Some of the most striking and unspoiled badlands formations are found here. Several vegetative classes of the Wyoming Basin Province Ecoregion which is not included in the NWPS, are in the area (BLM 1990). Crucial winter range is provided for mule deer and pronghorn antelope.

Red Butte WSA, also not recommended by the BLM, has about 24, 000 acres worthy of recommendation by the Citizens' Proposal. Internationally significant paleontological resources and unusually beautiful badlands scenery typifies Red Butte. Ferruginous hawks and burrowing owls, both species needed special management have been documented in the area (Ritter, 1991). The loss of wilderness values due to oil and gas development would be immense.

The Red Canyon Creek Special Recreation Management Areas, the Absaroka Foothills, all badlands formations, and area surrounding the Bighorn River should be off-limits to oil and gas development.

The Badlands BRMA should be designated an ACEC due to its fragile soil, unique formation resource delightful for exploration and scenery.

All areas in the Citizens' Proposal should be protected. Should you require further information concerning the Citizens' Wilderness Proposal for Wyoming BLM Lands, please do not hesitate to contact me.

Thank you for this opportunity to comment.

Sincerely,

Liz Howell

Liz Howell

313

RECEIVED
MAY 2 1995
BUREAU OF LAND MANAGEMENT
BIGHORN BASIN DISTRICT

To: Bob Ross C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119
FAX (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently the sales tax base) and the affected counties and communities due to restrictions proposed within all of the Alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please fund my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intermixed with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

313.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Gary T. Roche

314

RECEIVED
MAY - 4 1995
BLM
BEAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

314.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

-I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Dawn R. Roche

315

RECEIVED
MAY - 4 1995
BLM
BEAU OF LAND MANAGEMENT

May 3, 1995

BLM
C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Gentlemen:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below:

1. I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

2. I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

3. I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

4. I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

5. I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

6. I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

Very truly yours,

Steve M. Daniels

Steve M. Daniels
[redacted]

RECEIVED
MAY - 4 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

316

Bureau of Land Management
c/o Bob Ross
P. O. Box 119
Morland, Wyoming 82401-0119

Re: Grass Creek Area Draft EIS

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts. I feel this is especially true for oil and gas development impact and mitigation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Calvin D. Reavis
Calvin D. Reavis

RECEIVED
MAY - 4 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

317

May 3, 1995

BLM
C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Gentlemen:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

1. I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.
2. I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.
3. I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.
4. I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.
5. I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.
6. I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

Sincerely,

Phillip D. Yancer
Phillip D. Yancer

RECEIVED
MAY - 4 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

318

BLM c/o Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I would like to take this opportunity to contribute my comments to the Grass Creek Area Environmental Impact Statement.

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil, gas and minerals, industry, timber and local and state governments.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation. It would seem that some peoples idea of "outdoor recreation" is sitting in a city park watching the squirrels.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts. I am employed by an oil company and everyone see the magnitude of restrictions placed on oil development and exploration. But I also know that most companies are very concerned about the environmental impact.

I object to the minimal consideration given to the economic impact to businesses and also tax bases. With local and state governments continually looking at a shrinking tax base, the Grass Creek EIS will only contribute to that. This proposal will contribute to the loss of jobs and income for Wyoming families. Whatever happened to good "of common sense" It seems that the only solution to a problem anymore is "more restrictions"

I recommend that the economic impact of this be carefully reviewed and that this undue federal expansion of restrictions be stopped!! What ever happened to "of the people, by the people, for the people"? It doesn't say "for a few people".

Thank you for your time.

Sincerely,

Lilly Dene Grab
Lilly Dene Grab

RECEIVED
MAY - 4 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

319

Nov 2, 1995

BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6195

Dear Mr. Ross:

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my objections listed below:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives, and strongly recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Small, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all Wild Animal management to the State Game and Fish where it truly belongs, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should really be completely redone.

I object to the small amount of land considered for suburban expansion. More land needs to be made available for expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives, especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes. Knowing the dwindling oil production rates we see annually and their subsequent reduced tax revenues, we should not curtail other business-generated income; this would in essence be "cutting our own throats."

I object to the severe and undue number and level of restrictions

319.2

on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation. Minerals are facing an ever-increasing tax burden in a state already with one of the highest mineral tax rates. This scenario needs to be gradually reversed thereby allowing tax incentives for the mineral industry.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be considered.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

I would very much appreciate your consideration of my comments. Thank you!

Sincerely,

Terry K. Skinner

Terry K. Skinner

320

B.L.M
Re: Grass Creek Resource Area

Attn Bob Ross-

Please be advised that I for one, object to the above referred to Proposal. We cannot tolerate any more Federal Controls pwer pir Wuyiong :sendv' Ppr any purposes - This environmental and endangered species programs are completely out of line with the general nature of our country. Please Mr Ross, Lets be realistic about controls and stop this madness before it destroys all the confidence we have in our Federal Government. (any any we have Left in it.)

Sincerely

/s/ James Ellison

PS Maybe in the next election we can finish cleaning up the mess in Washington

/s/ J

James & Patricia Ellison
xxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx

RECEIVED
BLM
DIST OF LAND MANAGEMENT
Mail Room

321

BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Portland Wy 82401-0119
Fax (307) 347-5195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil/natl gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM Utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

321.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

RECEIVED
MAY 4 1995
BLM
WORLAND DISTRICT OFFICE

322

To: BLM C/O Bob Ross
Re: Grass Creek Area Draft EIS
P.O. Box 119
Worland Wy 82401-0119
Fax (307) 347-5156

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be Clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area BLM. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

322.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and prairie dog- Black-footed ferret inferences.

323

Gibbons Company, Inc.

5/3/95

BLM
Worland District Office
Attention Bob Ross -

Dear Mr. Ross

As a businessman representing Gibbons Co Inc Ford NewHolland Dealership in Worland, I am dependent on the economy of the area, and do oppose the Grass Creek Resource plan. Why because the restriction it places on grazing, mineral and oil development timber industry recreation etc. The continued use of Federa land for these purposes is vital to our economy.

Bob lets work toward these goals, not against us.

Sincerely -

/s/ Terrell Gibbons

RECEIVED

324

Greater Yellowstone Coalition

Bob Ross
BLM Grass Creek Resource Area
P.O. Box 119
Worland, WY 82401

Dear Bob Ross, May 1, 1995

Please accept the following comments regarding the Grass Creek Resource Management Plan Draft Environmental Impact Statement on behalf of the Greater Yellowstone Coalition. GYC is a regional conservation group dedicated to the sound management of the Greater Yellowstone ecosystem.

ECOSYSTEM MANAGEMENT

The Grass Creek Resource Area (GCRA) lies within the Greater Yellowstone ecosystem and as such deserves careful management and appropriate decisions to assure the future health of the ecosystem. This resource area offers ecotones ranging from desert basins and badlands to high alpine tundra with several zones in between. This wide diversity of ecosystems provides important habitat to the varied plants and animals of the Greater Yellowstone ecosystem.

In particular, species such as grizzly bears, black bear, bobcat, lynx, bighorn sheep, moose, mule deer, elk, marten, small mammals, fox, coyotes and a wide range of waterfowl, songbirds and hawks are key components of the ecosystem. In order to achieve the ecosystem management goals proposed by the Bureau of Land Management, GYC suggests that the BLM consider these conservation alternative recommendations for the Grass Creek Resource Management Plan EIS.

Although we agree with the BLM that people and their social and economic needs are an integral part of ecosystem systems, we feel that this document overwhelmingly privileges human needs and others. People are part of every ecosystem on earth now, but we recognize that the health of these ecosystems benefits human ecology. For as as the creatures and ecosystems go so go the people, we must be careful not to exclude the biologic needs in consideration of the economic needs of the earth's inhabitants.

We liberators suggest that you consider a Conservation Alternative in this analysis. Since the range of existing alternatives is too narrow, we suggest a 6th alternative recommend that 100% of the results available lands be leased for oil and gas. This is not in the spirit of what FLPMA directed as an adequate range of alternatives.

Main Office — P.O. Box 4851 • Bozeman, Montana 59771 • 406 586-1593 • FAX 406 586-8851
Helena — 1520 E. Sixth Ave., Suite 210 • Helena, MT 59601 • 406 443-7520 • FAX 406 586-8851
Wyoming — P.O. Box 3838 • Jackson, WY 83001 • 307 733-3188 • FAX 307 733-3187
Washington, D.C. — 1400 Eye Street, N.W. • Suite 1000 • Washington, D.C. 20005 • 202 515-9010 • FAX 202 515-9020

324.2

CONSERVATION ALTERNATIVE

1. The GCRA should recommend for wilderness designation proposed by the Citizens' Alternative Wilderness Proposal including: Red Butte, Sheep Mountain, Bobcat Draw, and Owl Creek. This small area comprising only 6% of the Resource Area should be managed for primitive recreation and natural history study to retain their wilderness character.

2. The Areas of Critical Environmental Concern (ACEC) proposed by the draft RMP including Fifteenmile Creek, Upper Owl Creek and Meeteetse Draw should be protected with better stipulations. According to the Federal Land Policy and Management Act (FLPMA), ACECs should be managed as public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural or scenic values, fish and wildlife resources or other natural systems or processes.... Given this mandate, we consider it inappropriate to lease 100% of these ACECs for oil and gas. Mineral development inevitably causes substantial surface disturbance with increasing road density, drill pad development and waste pit impacts.

3. Range management must reflect the plant and wildlife needs as well as those of the livestock on each allotment. Given that nearly half of the grazing allotments are in "I" category, there is obviously a need to see serious change on the range. We support seasonal changes in put on/take off dates as well as more intensive monitoring to show when certain areas, especially riparian areas, reach utilization. Range monitoring is essential to meet the standards and guidelines required by FLPMA and reflected in the RMP. GYC is not convinced the BLM will be able to achieve the increase in proper functioning riparian habitat with the continued level of grazing prescribed in the preferred alternative.

According to the BLM the Fifteenmile Creek is the largest sediment-producing tributary to the Bighorn River. Erosion caused by historic overgrazing has caused serious siltation and streambank cuts that may never heal under the current grazing use. We propose that the BLM implement the riparian standards drafted by the Beaverhead National Forest (see enclosure). However, in some areas of severe non-functioning riparian systems total rest may be necessary to allow recovery of the herbaceous plants.

The 60 percent utilization used in the GCRMP is excessive according to these guidelines. In "high sensitivity" areas such as "I" category allotments the recommendation is to allow no more than 10% streambank disturbance above what occurs naturally. In addition, by its own intrinsic problems utilization is not always a good indicator of streambank stability or riparian health. We recommend that each allotment undergo a proper review and adjustment in grazing use. This may involve a further decrease in AUMs than is proposed in the preferred alternative, but the trade-off could mean an increased productivity of the land, the water table and improved health of the ecosystem.

324.3

4. Wildlife habitat is an important use of all public lands and one that conservationists support. Wildlife has proven itself to be a large attraction to visitors to Wyoming as well as residents for consumptive as well as non-consumptive uses. Photographers, hunters, hikers, birders and fishers are regular users of Wyoming's BLM lands and yet the preferred alternative does not reflect those demands. The BLM must manage beyond Wyoming Game and Fish herd objectives and look at ways to provide the necessary forage for the diverse game and non-game species in the GCRA. Many of the wildlife populations in the resource area are impacted by the severe over-grazing, the high road density in certain areas, and the excessive logging. Allowing for wildlife population expansion "where appropriate" or "to the extent possible" as stated in the preferred alternative is not representative of the ecosystem management the BLM has proposed.

Crucial winter range is the deciding factor to the survival and long-term health of all wildlife species. We support the conditions of Alternative C in this case rather than simply protecting the crucial winter range of a few select species.

5. Mineral development of sensitive lands has been demonstrated to impact the surface and subsurface values of the resource area. We recommend total hardrock mineral withdrawl of sensitive areas such as the ACECs, WSAs, and cultural resource sites such as Legend Rock in perpetuity.

Oil and gas leasing has been indiscriminate on BLM lands around the state with an average of 95% of all available lands leased. This is not multiple use management, this is industrialization of the nation's public lands. Such a high level of possible development would preclude other uses from taking place on those lands affected. Hydrogen sulfide gas has been a chronic problem on oil field production sites in the Bighorn Basin. H2S poisoned areas would mean that the wildlife mortality would be able to access certain areas of the GCRA. We support true multiple use management and therefore encourage the reduction of active leases in sensitive areas by refiring expired leases as they come up. An inventory of the cultural resources, ACECs, high density recreation sites and cultural resource sites would provide the BLM with a representative way of deciding which areas to withdraw.

6. Cumulative effects analysis (CEA) should be an integral part of this analysis and yet so many of the sensitive resources on the GCRA would be impacted. We consider a CEA essential to the future management of the Grass Creek ecosystem.

With the Geographic Information System now available, the BLM is able to overlay the resource inventory with condition and needs to determine how best to manage these resources in the future. We encourage the BLM to take advantage of this technology to allow the best decisions to be made for the ecosystems.

324.4

7. Wilderness Study Areas and Wild and Scenic River review should have more direction for what will be the future management of the areas affected in the event that Congress doesn't designate such areas. In particular, we consider that the WSAs should be managed to protect their wilderness quality even if Congress does not act to designate them as wilderness. In addition, the Upper South Fork Owl Creek should be recommended for National Wild and Scenic River status. We reviewed the criteria and disagree with the decision made by the BLM that the Upper South Fork Owl Creek not be recommended to the National Wild and Scenic River System. The South Fork Owl Creek's spectacular canyon country would be a welcome addition to Join the Clarks' Fork as one of Wyoming's Wild and Scenic Rivers.

In conclusion, we encourage you to consider these comments seriously and include these recommendations in your final decision on the environmental analysis.

Sincerely,

Meredith Taylor

Meredith Taylor
WY Field Representative

324.5

DRAFT
RIPARIAN GUIDELINES STRATEGY
BEAVERHEAD NATIONAL FOREST
1992

CURRENT AS OF 6/2/92

INTRODUCTION

Major emphasis is being placed on riparian conditions in relationship to livestock grazing section-wide. The Beaverhead National Forest Plan addressed the relative importance of riparian areas. However, forage utilization was the only criteria identified that was assigned quantifiable standards. Monitoring since the plan was completed has shown that streambank stability, bank stable height, and condition of palatable browse species appear much more critical to riparian health and function than forage utilization.

OBJECTIVE

Objective of these guidelines is to address streambank stability, stubble height (vegetative cover), and palatable browse utilization in meaningful, measurable terms that meet goals and objectives specified in Chapter II of the Forest Plan.

DISCUSSION

Review of available information and on the ground application and monitoring indicates that streambank stability, stubble height and palatable browse after livestock are removed from an allotment and the growing season ends, and use on palatable browse species, in addition to forage utilization, are all critical to restoration or maintenance of riparian values.

The following guidelines are provided. They are not designed to achieve the riparian condition that might theoretically exist in the total absence of grazing by livestock or wildlife. They recognize that there are trade-offs involved when grazing occurs in riparian areas. Composition and density of plant species may change. Streambank will be impacted. Individual streams also have a natural level of variability that is characteristic of that system, independent of grazing pressure.

These guidelines are designed to be used in those instances where impacts of ungulate grazing are being noticed on riparian areas. They can be applied to both livestock and wildlife. Keep in mind the dynamic factors present in nature. Vegetation will change over time, depending upon disturbance factors such as fire frequency, weather, other uses, and natural succession, as well as grazing pressure. Impact of all factors must be considered through interdisciplinary interaction when evaluating existing, potential and desired conditions.

Desired future condition must be based on site specific evaluation. Normally, a riparian site can be located along almost any stream, or along a nearby stream with similar characteristics, that will help indicate what the desired future condition should be for the area in question. Base specific standards on what is necessary to achieve the desired future condition for the area in question.

...to...

Guidelines presented here are professional estimates of actions necessary to achieve Forest Plan Goals and Objectives. Goals and objectives are permanent. These guidelines, as applied to address site specific needs, must be monitored over time to ensure they are meeting Forest Plan objectives relating to riparian function, water quantity and quality, fisheries, vegetation and other issues and concerns.

Size of the individual areas of concern must be determined from site specific evaluation. Riparian areas on the Sawtooth normally relate to linear distance along a stream, or to large meadows related to high water tables and gold site drainage. Minimum size recommended for aquatic/riparian in normal circumstances is 50 feet of stream length, or 2 acres of meadow. Document circumstances and decisions based on other sizes. Small areas are common factors that lead to decisions based on other sizes. Small areas are common within seasonally dry livestock grazing allotments where impacts are obvious. These impacts normally relate to livestock drainage, or "corps" immediately adjacent to fences. If these areas are located only in isolated instances, do not base total allotment management on this disturbance. If they are critical to meet objectives, then protect them from animal use by fencing or other means. Opportunity or need to deviate from the guidelines specified below may also be identified on a site specific basis during interdisciplinary discussions. Document the reasons for making these decisions in National Environmental Policy Act evaluation.

GUIDELINES:

Site specific guidelines will be prescribed to meet specific issues and concerns identified through the Interdisciplinary Process for all allotments during evaluation and development of Allotment Management Plans. In general, these guidelines will incorporate the following as a minimum:

STREAMBANK STABILITY: Bank stability is critical to maintain or improve riparian condition. The importance of streambank stability relates to existing condition, specific factors unique to that stream, and desired future condition. Riparian areas needing special consideration (ie-highly sensitive, or those with sensitive fish or plant species, current condition relates to heavy pest shows that need to be corrected as soon as feasible, sensitive soils, etc) will require less streambank damage to achieve desired future condition than those that appear less sensitive (ie-those with common vegetation, common or no fish present, stable soils, etc.). Use guidelines researched by David Rosgen in estimating the amount of streambank that should be stable under normal, ungrazed conditions. Use the following guidelines as the basis for decisions, depending on riparian sensitivity:

High sensitivity: Allow no more than 10% streambank disturbance above what occurs naturally.

Moderate sensitivity: Allow no more than 25% streambank disturbance above what occurs naturally.

Low sensitivity: Allow no more than 40% streambank disturbance above what occurs naturally.

STUBBLE HEIGHT: The height of standing herbaceous vegetation remaining after the flood plain at the end of the livestock grazing season. Adequate stubble, whichever ends last. Will protect soils and streambanks during exposure to high flows, and filter out sediment and build streambank over time. In this instance, the flood plain should relate to the area that is anticipated to be flooded during normal high water, up to 25 year events.

High sensitivity: Maintain 6 inches of stubble height at the end of the season.

Moderate sensitivity: Maintain at least 4 inches of stubble height at the end of the season.

Low sensitivity: Maintain at least 3 inches of stubble height at the end of the season.

HERDER UTILIZATION: Control of utilization of woody species is critical to the general health and regeneration of plants such as willows, aspen, dogwood, etc. Woody vegetation protects riparian areas from streambank trampling, prevents soils, provides cover important to fisheries values, and has important wildlife values. Information that was prepared for the Sawtooth NRA will account improvement in the condition of woody vegetation, and peer reviewed plants are not vanish if use exceeds 30%. Interdisciplinary review will identify if the site is actually capable of supporting woody vegetation, and assign the percent of use to be considered at the end of the livestock grazing season. Additional monitoring is required before plants initiate growth the following season to evaluate additional browse impacts by wintering wildlife. We may need to work with NRFWP to reduce wildlife numbers if that use is identified as the limiting factor. Additional action, such as use of prescribed burning, may help stimulate regeneration and condition.

Good Condition Woody Vegetation (75+% of standing stems are living, "hedging" is not readily evident): Allow up to a total of 40% utilization on annual growth by livestock and wildlife.

Fair Condition Woody Vegetation (50-75% of standing stems are living, "hedging" effects are evident): Allow up to a total of 30% utilization on annual growth by livestock and wildlife.

Poor Condition Woody Vegetation (less than 50% of standing stems are living, "hedging" effects are prevalent, with umbrella shaped or three sawmill): Allow up to a total of 20% utilization on annual growth by livestock and wildlife.

MONITORING AND MODIFICATION

Monitor the growing season while livestock are using each pasture. Move them when any one of the above criteria is reached. Normally, one of the above criteria will outlast as the determining factor for allowable use in each pasture or allotment. Subsequent changes be attempted if you wait until all factors are utilized to the "limit".

Establish permanent transects to evaluate condition over time. Use the Sawtooth National Forest approved Riparian Photo Point transects to monitor

the response of key elements, such as width/depth ratio, amount of undercut bank, etc., over time. Use photo plots to monitor the response of riparian vegetation.

The 75% streambank stability, 4 inches of stubble height, etc. are monitoring tools, not objectives. If monitoring identifies that Forest Plan and site-specific objectives are not being met under the prescription developed under the interdisciplinary process, then you need to back off onto (ie-use 90% streambank stability instead of 75%, etc.). If, over time, conditions improve to meet these objectives, and the desire is to maintain it at that condition rather than improving it, you may be able to back off slightly. Monitoring is the key. If things are moving towards objectives, you are using the right management. If you see a downward trend or can't determine an upward trend over time, then you need to manage for less impact.

RECEIVED
AUG 2 4 1994
BLM
BLM/ST LAKE DISTRICT OFFICE

C/O Bob Ross
Grass Creek Area Draft WIS
Box 119
Hailand Wy 82401-0119
Fax (307) 347-6259

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives. And I request that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered Lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

325.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

William Shule

RECEIVED MAY - 4 1995 BUREAU OF LAND MANAGEMENT WORLAND WYO. 12:49

326

To BLM C/O Bob Ross
Cross Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6196

I object to the significant financial impacts to businesses. Individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Cross Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Cross Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-footed ferret inferences.

John D. Engelke

DAVE BALLING FARMERS TEL:307527-5056 May 06'95 13:53 No.002 P.01

RECEIVED MAY - 4 1995 BUREAU OF LAND MANAGEMENT WORLAND WYO.

327

Webster Ranch Company
72 RD 3RD
Meeteetse, Wy. 82433

May 4, 1995

Bob Ross, RMP Team Leader
Worland BLM Office
P.O. Box 119
Worland, Wy. 82401-0119

Dear Mr. Ross:

Webster Ranch has been family owned and operated since 1900 and has three grazing allotments in the Grass Creek Resource Area. Through 15'e directors, Webster Ranch objects to several issues contained in the Resource Management Plan Draft Environmental Statement (DEIS) for the Grass Creek Resource Area.

In general, the DEIS "preferred alternative" is an effort to shift the priority of use for public lands from that of livestock, mineral and timber industries to wildlife. These industries can and have co-existed successfully with wildlife over the years and provide the tax base with which the surrounding communities, including Meeteetse, rely upon. Local culture and customs are not being taken into account and will obviously be negatively affected if the "preferred alternative" of the DEIS is enacted. It is impossible that a projected 32% increase in wildlife (which is highly unlikely) will offset the loss or less of economic that the "preferred alternative" would cause. Additionally, BLM definition of consumer management, "social and economic well being" must be taken into account. The "preferred alternative" of the DEIS does not fulfill this requirement.

As for the alternatives given within Table 2 of the DEIS, 71% of the statements for comparison read "same as preferred", giving an inadequate range of alternatives in which to choose (in violation of the National Environmental Protection Act). Even the alternative described as "current", by reducing authorized grazing by 33%, does not reflect the current situation. Why when by the BLM's own studies the majority of allotments are in fair to excellent condition (table 3-6) would a 33% reduction in grazing be required?

Other specific areas of opposition to the DEIS are:

1. Designating the Fifteen Mile Watershed as Area of Critical Environmental Concern (ACEC) because of sedimentation to the Bighorn River (p. 151)

The BLM should not be able to create a defacto wilderness area, with similar restrictions as wilderness areas, without congressional comment. The Fifteen Mile watershed contains 900 square miles and the majority of grazing land used by Webster Ranch within the Grass Creek Resource Area. Designating this area an ACEC would severely limit use of Webster Ranch allotments. If

---

DAVE BALLING FARMERS TEL:307527-5056 May 04'95 13:54 No.002 P.02

327.2

creating a ACEC for the entire area would only reduce sedimentation by 1%, why penalize allotments that are properly managed?

2. Effects of the DEIS on Livestock Grazing

Much of the wording in the "preferred alternative" is ambiguous and can be interpreted differently. For example, what is the definition of "poor vegetative condition"(p. 361)

The suitability data used for the proposed reduction in authorized grazing has been deemed by the BLM itself as unreliable and invalid. Therefore, table 3-5, Appendix 3 is inaccurate and should not be included or used in the final Resource Management Plan. The proposed 55% overall reduction in authorized grazing has no justification except in specific cases and only when effective criteria are met. Total Webster Ranch allotments are projected to be cut by 1244 AUMs or 31% (Appendix 3, p. 254-255). AUM availability is the basis used for appraisal and long term planning and must not be reduced based on invalid criteria.

3. Overall Wild Horse Management Objectives

The "wild horse" herd with the Grass Creek Resource Management Area is not a true wild horse population. The ancestors of these horses were domestic turn outs or runaways. They are more detrimental to public lands than properly managed livestock. Why should the BLM be allowed to spend 15 million dollars, take an additional 2500 AUMs from livestock and double their habitat area when an authentic wild horse herd resides in the Pryor Mountains 100 miles away?

In closing, if the preferred alternative is enacted as is in the DEIS, it would be catastrophic to the families and economies within and surrounding the Grass Creek Resource Management area. Also, any changes to livestock, mineral or timber usage on public lands should be based upon subjective, accurate data with the consultation of local, county and state organizations. Please take these comments into account for the final Resource Management Plan.

Sincerely,

Don Webster — Don Webster, President

Gene Webster — Gene Webster, Vice President

Charlie Webster — Charlie Webster, Secretary

Brian Webster — Brian Webster, Treasurer

cc: Governor Jim Geringer
Representative Barb Cubin
Representative John Doolitt
Senator Alan Simpson
Senator Craig Thomas
Dick Lugar
Ed Whitacre

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

This is a copy of letter faxed on 5/04/95.

328

Leo & Rosemary Benson
[redacted]
May 4, 1995

Bob Ross, BLM Leader
P.O.B. 119
Worland, WY 82401-0119
FAX: 307-347-6195

Dear Sir:

We have followed the reports in the Casper S-T and other sources concerning your Grass Creek Resource Area Management Plan DEIS. We've read that the area is comprised of either 1.5 or 1.8 million acres and that you propose to open all of it for oil and gas leasing and intensive grazing because you feel such an action is required by law or intent of Congress.

However, we've also read: "By law, multiple-use includes much more than just mining, grazing, timber cutting, & mineral development. As defined by Congress, multiple-use includes non-extractive uses such as protecting & managing wildlife habitat, maintaining healthy & functioning fisheries, protecting water quality & watersheds, providing opportunities for education & scientific research, recreation, & aesthetic values, & preserving important historic & cultural resources."

Sometimes humans come only slowly to acknowledging new realities. We work hard to construct a framework of comprehension and then find it suddenly has become obsolete while our attention was elsewhere. Last century we believed we had too few people and limitless land and natural resources. Development was patriotic; failure to extract resources was wasteful.

But then-existing development technology rendered unprofitable the conversion of most of the federal lands into private ownership by Jeffersonian small farmers or entrepreneurs. And to this day, it's more profitable for resource-users on public lands to lease at subsidized rates than to purchase, maintain, and pay property taxes.

So it happened that ownership of the federal lands was retained by the American people. But are our lands being managed for the long-term benefit of the 250 + million owners and their heirs, or for the short-term highest profit of special, often corporate, interests? Hasty & short-sighted management decisions have led to the damming of rivers without honest accounting of true costs, to the degradation of riparian corridors, to the wasteful use or pollution of precious water, and to development that creates a multiplicity of roads destructive to wildlife habitat.

328.2

Please help maintain biodiversity. Please help insure that the native plant species needed to sustain native animal species will be preserved. Please help provide the required solitude and protection needed by these native animal species.

- Control the sprawl of mineral development;
- Prevent random ORV road-making;
- Protect water quality & riparian corridors from over-grazing.

Please offer the strongest possible protection (by placing off-limits to mineral development) to:

-- the three ACEC's: Upper Owl Creek, Meeteetse Draw Rock Art Area, & Fifteenmile Creek;
-- the three potential NNL's: Tatman Mountain, East Ridge-Fifteen Creek Badlands, & Gooseberry Badlands;
-- the potentially eligible S. Fork of Owl Creek as a Wild & Scenic river;
-- the four WSA's: Red Butte, Bobcat Draw Badlands, Sheep Mountain, & Owl Creek.

At this time you have the power and opportunity to protect one portion of Earth (the only planet we've got) for only the immediate future - the next 10 to 15 years. Prospects for the more distant future are depressing. But that is not a valid excuse for abdicating responsibility. Please look to long-term sustainable resources rather than short-term quick profit at any cost of degradation. Please don't take the attitude that you'll be retired and living somewhere else, and that it's your replacement who will have to wrestle with problems that have been allowed to develop.

The ideal of sustainable resource on Public Lands has numerous vocal opponents: many in the agricultural community and mineral industry, other foes of federal government and regulation, groups who feel that God will intervene any day now and repair any damages that might impact adversely upon the chosen. Wise management on your part will ultimately benefit all of these interests -- and all of the rest of us too!

Sincerely,

Leo & Rosemary Benson

Leo & Rosemary Benson

329

May 4, 1995

Mr. Bob Ross
RMP Team Leader
P.O. Box 119
Worland, WY 82401-0119

Mr. Bob Ross,

This letter is to opose the Grass Creek REsource Draft Land Use Plan. I believe it is the gradual encroachment of the rights of the citizens of Wyoming, and would cause serious problems for the economy of the entire Big Horn Basin, not just the livestock people that have grazing permits in the area.

I do not beleive Wild horses shold come before people. I think the fifteen mile herd should be cut down to fit their present range or better yet should be eliminated altogether. I do not believe oil and gas exploration should be curtailed in any way.

Sincerely

/s/ Chester Mercer
xxxxxxxxxxxxxxxxxxxxx

MAY 05 '95 07:15 [redacted] P.1/2

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT

330

May 4, 1995

Bureau of Land Management
C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119
Fax (307) 347-6195

Mr. Ross:

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the significant financial impacts (both direct and through reduction of the tax base) to businesses, individuals, and the affected counties and communities due to restrictions proposed within all of the alternatives. I recommend that a new preferred alternative be created with the help of knowledgeable private individuals and representatives from recreational groups, local and state governments, oil and gas, minerals, grazing and timber industries.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP and returning all wild game and non-game animal management to the Wyoming State Game and Fish Department.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. This is especially important for those lands surrounded by BLM administered lands.

I object to arbitrary restrictions that will hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

MAY 05 '95 07:16 [redacted] P.2/2

330.2

Mr. Bob Ross
May 4, 1995
Page 2

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals and grazing.

I object to the proposed blanket restrictions contained in the Off-Road Vehicle Management plans.

I object to the small consideration given to the economic impacts the Alternatives would have on businesses and the area's tax base . Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for many of the restrictions which may be imposed.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, as well as Prairie Dog and Black-Footed Ferret inferences.

Finally, I believe it is imperative that more consideration be given to fostering the economic well being of the residents in and near the Grass Creek Resource area and that less emphasis should be placed on natural resource preservation issues championed mostly by those who have little or no vested interest in the area. While all Americans are truly the owners of these public lands, few directly depend on them for their livelihood. This is not to say that we who prosper through the use of these resources wish to see development at any cost in terms of damage to the resource. We only ask that reasonable access to the resources be allowed and that reasonable regulations be applied which reflect the technical and economic realities of today and recognize that the resources found on the public lands can be utilized without undue damage.

Brian A. Hodgson

Brian A. Hodgson

[redacted]

331

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

331.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

[signature]

332

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

332.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Tommy Thull

333

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6199

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

333.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Matthew Thull

334

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6199

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

334.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unauthenticated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

RECEIVED
MAR - 5 1998
BLM
NATIONAL PARK SERVICE
RECEIVED

Spring Gulch Coal Company

335

Box 653 Powell, WY 82435

Mr. Bob Sims, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

RE: Grass Creek Resource Area Management Plan DEIS comments

Dear Mr. Sims:

First, we acknowledge that resources must be managed in such a manner so as to maintain or enhance their viability and in so doing all the multiple users of the area will benefit. Management must seek to gain the greatest return from these resources that will provide for the long term continuation of the economic viability in the area, returning revenues to the federal government, State of Wyoming, counties and local communities.

The tone of the document and the Preferred Alternatives presented for the most part do not give a positive direction to the majority of multiples uses across for wildlife and range growth. In fact the direction of the proposed plan indicates that if the Preferred Alternatives are all accepted, the Grass Creek Resource Area will experience substantial economic losses, particularly the oil & gas industry and livestock industries.

The plan does not follow your comments (page 8) " The principles of ecosystem management, need to BLM's day to day management of the public lands and resources, include recognition that people and their social and economic need are an integral part of ecological systems."

The table on page 190(table 27) indicates the forage available for livestock in the preferred alternative showing a 22% increase in cattle authorized grazing with a corresponding 20% reduction of active preference and a shocking 42% reduction from the actual use of 1990. How does this show the recognition of the people where you propose to eliminate 25% of the grazing? How can the statement (page 16) preferred alternative) "Grazing use would be adjusted on a constant rate during the multiple period, reaching anticipated levels as activity plans are implemented." When there is no supporting documentation to justify the reductions? The reductions proposed indicate that all allotments are targeted for reduction when, in fact, some have already had substantial reductions, also there has been recent changes in management programs designed to increase grass production so those allotments for the benefit on not only the operator,but the wildlife and environment as a whole.

The proposed plan as stated above will only provide a slow death to many of the smaller ranchers, communities, businesses and people residing in the resource area. If current conditions indicate there reductions are necessary, it needs to be made known "up front" at this time rather than small reductions each year over the next 10 years!

Spring Gulch Coal Company

335.2

Box 653 Powell, WY 82435

page 2:

Please explain why the Wild Horse Herd area needs to be expanded other than the fact that your personnel are unable to manage this herd as they should be managed. You require the permittee to maintain their livestock within their allotments and not allow for trespass if they do not, and yet, for your agency so be able to manage their "Wild Horses" you just expand the area! This seems to be in conflict with your operating under different criteria than your permittees. There does not appear to be any cost benefit to the public from the proposed expansion.

The restrictions and limitations being proposed on the Oil & Gas industry are excessive! These limitations will substantially reduce revenues throughout the resource area which in turn will cause substantial economic losses to community, business, county governments, state governments and even the federal government. It is apparent that the more restrictions to your leases cover the resources within the resource area without having the proposed additional restriction of "No Surface Occupancy or Controlled-surface use."

The final decision on the timber aspect of the EIS should be changed to allow a larger harvest of timber which you state is "On a mature." A wise use of the timber product is to harvest the trees, using current methods such as selective cutting, that will allow for new growth, wildlife protection and maintain the economic base of the area. This is a win - win situation rather than restricted proposals listed in the plan.

Fire management needs to be expanded and a larger number of acres considered for fire treatment not your than the 300 proposed. It is alarming to learn that your proposal is substantially less that the average treatment of the past 10 years or so. The 300 acres will not even control the encroachment of timber pine and juniper(page 146) of 1900 acres per year. It is ironic that your statement (also page 146) "within three years, herbaceous vegetation would exceed pre-burn levels and grasses replace shrubs. Generally, range condition total forage production, and biological diversity would improve." Why then is the treatment limited to no few acres?

Your concern of the sage grouse population is well founded, however, if someone would examine the real issues of why the population is not recovering they would find that the result of the decline is not because of hunting but there has been a substantial increase of predators in the resource area. There is no plan identified in the EIS that addresses predator control, in fact, it appears that you are encouraging the increase predators. (page 251) " The Northern Rocky Mountain Gray Wolf is not anticipated to establish packs within the planning area. But if packs were formed, the protection of big game animal by national institution would benefit the wolves by preserving their prey." Would not these wolves also prey on the sage grouse population and therefore be subject to some type of a control plan?

Consideration of building a road up the fifteen mile creek area to view the wild horses is not a realistic decision. The road would have to be built in an area of critical environmental concern and would need to be an all weather road. The soil type in the majority of the area is not favorable to roads, especially when there is a little bit of moisture. How do you propose to build the off road travel in that area when there are many miles of highly erodable soils?

Spring Gulch Coal Company

335.3

Box 653 Powell, WY 82435

page 3:

Mr. Sims, it appears the majority of the proposed "Preferred Alternatives" give direction to a more restrictive multiple use without adequate consideration of the negative economic impacts that are being created by the proposals that will restrict the Oil & Gas Industry, Timber harvesting, Livestock grazing and the customs and culture that has been developed in this area from the early 1880's to the present. It appears that the multiple users in the resource area are not being considered a part of the "public".

The direction of the plan appears to be in conflict with your statements that the area is presently functioning fairly well. Therefore is is recommended that the plan as it is presently written be revised to provide a more positive direction that will at least minimize the various multiple uses that are identified as the levels indicated in 1990.

If these recommendations are incorporated it will provide the continued stability for the citizens, businesses, industries and various governmental agencies within the resource area. I believe the Bureau has a responsibility to ensure the resource area is not diminished in any manner below that identified in the year of 1990.

Respectfully,

James E. Hillberry
Assistent Secretary

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

336

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6196

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each Allotment. Targets should be clearly established and stated.

I object to the expansion of 'Wild Horse Management' areas. I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

336.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Jennifer Morrison

337

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6196

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each Allotment. Targets should be clearly established and stated.

I object to the expansion of 'Wild Horse Management' areas. I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

337.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Jay Morrison

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

338

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

338.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Lenard Donna

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

339

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

339.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Verna Donna

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
Rawlins, Wyoming

340

To BLM C/O Bob Rose
Cross Creek Area Draft RMP
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals And representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Cross Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Cross Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private Sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intended with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in All of the Alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic **340.2** to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
Rawlins, Wyoming

4 May 95 **341**

Mr. Bob Rose, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

R.E. Cross Creek Resource Area Management Plan - D.E.I.S.

Dear Mr. Rose:

Management of our public lands and the unique quality of life found in the Cross Creek Resource Area are very important to the citizens of Wyoming and the Public. Therefore management of those lands must be flexible, founded on valid research, broadly considered, and provide for the maximum economic return for the Public.

The DEIS that is printed does not provide the consideration of maintaining the area at the present level of economic activity, custom, culture, livestock grazing, oil and gas development, recreation and timbering. Therefore I strongly urge you to reconsider the DEIS and provide the following in the final draft:

1. Allow increased timbering to utilize the existing 86% mature forest timber, utilizing various methods including selective cutting that will allow the maximum monetary return to the Government and local communities, wildlife protection and other recreation.

2. Expand the use of fire treatment in the entire resource area to a minimum of the average fire treatment of the past 5-10 years. (approximately 2000 acres.)

3. Maintain the livestock grazing AUM'S as they are presently authorized for both the permitted num's and actual use listed for 1990. Manage individual allotment on their own merits and not as a whole if there is a problem. You state " In general economic conditions on public lands in the planning area, including range vegetation, watershed and wildlife habitat are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced or that would warrant elimination of livestock grazing on public lands." Therefore, the proposed reductions of AUM'S do NOT MANDATE! Every effort should be made to keep ranching viable in the resource area.

4. Off Road Vehicle management must have a more clearly defined designation and have a strong enforcement program for violations. The present plan does not address this issue!

5. A predator control program must be developed and implemented for the resource area which considers livestock, wildlife and human beings. The program must consider the safety of the multiple users, and if necessary the predators should be removed or eliminated. Without such a program it will be almost impossible to expand the bird populations in the resource area.

page 2, continued **341.2**

6. The unreasonable restriction placed on the oil and gas industry in the preferred alternative should be eliminated. It equates the No Surface Occupancy and Controlled Surface Use are not warranted as those concerns are already covered by your standard leases agreement. These restrictions have an extremely severe impact on the economic stability of the area and affects revenues for the federal government, State of Wyoming and individual businesses and industries of the four counties involved with this resource area. We need to provide jobs not eliminate them!

7. Consideration and comments attempting to create new Wilderness without congressional consent is in violation of current laws attempting to do so by declaration of the Areas of Critical Environmental Concern (ACEC) should be stricken from the document.

8. There is no valid reason to expand the Wild Horse Herd,which is now costing the taxpayers over $15 million dollars to administer the program per year. Your management should be on maintain the herd at the level of 100 horses as stated in your 1988 summary. Building roads for the area that is of such special environmental concern and expanding the number of horses is not a wise use of tax money!

9. Adequate alternatives have not been provided. 71% of the alternatives comparing alternatives all read "Same as Preferred." This is in violation of the National Environmental Policy Act(NEPA).

Mr. Rose, the DEIS as published is a clear attempt to reduce multiple use, sustainable timbering, oil & gas development and livestock grazing. These are industries that provide significant revenues to the entire area and the Government. By your own agency statement "the area is functioning rather well." Therefore, Mr. Rose it should be your responsibility to develop a plan that maintains the resource area, that provides for enhancement of all multiple uses and not the economic degregation and disaster that the present plan proposes.

Please provide details of how you propose to incorporate these suggestions into the plan and bring some reasonableness to the DEIS.

Respectfully,

Michael H Hudson

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYO.

342

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-4259

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state agencies.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all Wild Horse Management areas in the Grass Creek area RMP. Return all Wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and availability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

342.2

I object to the small consideration give to the economic impacts to businesses and also tax bases. Beneficial impacts to business should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

/s/ Trenton D. Thull

To Whom it may concern:

I really do not understand why these changes include people other than Wyoming residents, and Frankly there is no sense in having wildlife reserves, if nobody is allowed to observe the wildlife. Wyoming is a beautiful state, and all the changes you propose, would change the face of Wyoming forever. We might as well not even have wildlife if nobody can view it.

Sincerely,

/s/ Trenton De Wayne Thull

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYO.

343

May 2 1995

Worland BLM
Bob Ross
RMP Team Leader
Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

Enclosed are my comments on the Grass Creek Resource Area Plan.

The Wilderness Act does not state that surrounding areas need to managed for impact on designated Wilderness. Rather, Wilderness areas should be analyzed for its impacts on surrounding areas. Considerations include the decrease in wildlife habitat, the loss of productivity, and the loss of biodiversity due to moderately grazing acres. The Wilderness Act does not state the buffer zones are necessary. The storage for mission for designated Wilderness provided a buzz is better. If people are disturbed from surrounding areas they from know the alternative to locate to the center of the designated Wilderness.

In the EA, it appears that the BLM has chosen its direction, and provided only the evidence that supports their preferred direction.

Where are the analyses on new technologies protecting environmental resources addressed? The analysis is very weak in providing an update on technologies or benefits from industry advances throughout the planning process. Before making the final decision, current technologies and their effects need to be analyzed. This should also be provided in a supplement and re-spread by the public.

The analysis is very weak in providing an economic analysis to surrounding communities, communities and community partners. This also needs to be provided with the counties participating in the actual analysis. Current agency economical analysis is based upon theory not reality. Colfax County, WY conducted a study with USFS social economic developments effects and found that the economic existence of the county is more dependent upon federal funds than the agency had originally depicted. Final decisions need to be made based upon solid economic impacts.

It is unfortunate that so much time and money has been spent to produce a document that reflects the agency desires, rather than a full range of implementable and honest alternatives. Prior to the final, please look at developing additional alternatives which are viable, implementable and provide maintenance of current community production.

Sincerely,

Mary Fitzhalek

John Fitzhalek

[redacted]

344

2 May 1995

Dear Worland BLM -

This letter is on the Grasscreek Resource area.
I feel that there is a clear bias against grazing. The Preferred Alternative reduces it by 25%. Is that much necessary? It also violates NEPA. It has a very wide range to choose from us [sic] many reading "same as *preferred*.

I don't think we need any more wilderness areas or ones managed as wilderness. I belive we need to use the ones that we have more.

People are part of the ecosystem. We need to remember that when we talk about loss of revenues to the people & economy.

Please consider this letter.

Sincerely -

/s/ Tonya Tysver

345

2 May 1995

To the BLM -

I am writing in regard to the Grass Creek Resource Area.

I believe that we have enough wilderness areas now. I don't agree that motorized vehicle have a negative impact but I also don't think we need more areas managed as if they were wilderness.

Technologies in any multiple use industries from which the enviroment benefits need to be given credit when its due.

We need to keep in mind the people are part of this earth. We need consideration of what the loss of revenue to the counties will do to the People & economy.

I hope you will consider this when you make your decision.

Sincerely -

/s/ Albert Tyaver

346

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Bob,

I would like to take the opportunity to comment on the Grass Creek Management Plan.

In my opinion:

1. The South Fork of Owl Creek should be eligible for a wild and scenic river designation.

2. The study area does not need more or improved roads, but the roads that are there should not be closed.

3. There should be a way of protecting the area from off-road vehicle abuse, the BLM should find a way to prosecute offenders, there should be a way other than just closing the roads.

4. The 1872 Mining Law needs revised before anymore mining leases are given.

5. The proposal to allow oil and gas leasing on every available parcel of land should be discouraged. Some leasing might be necessary but not a wholesale give away.

6. Riparian habitat should be protected and improved at all costs. Wildlife habitat improvement should be the primary goal, not cattle grazing easements. The cattle and wild horses have done a lot of damage to this fragile ecosystem and these numbers should be greatly reduced. I would like to see the BLM and Wyoming Game and Fish work more closely to improve wildlife habitat.

Sincerely,

Thomas A. Miltek

[redacted]

347

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-5195

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base). And the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of 'Wild Horse Management' areas. I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area ROP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against mineral, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

347.2

I object to the small considerstion give to the economic impacts to businesses and also tax bases. Beneficial impacts to business should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife spacies, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

/s/ Connie J. Thull

Please let me know why people from out of State who probably haven't even heard of Grass Creek, Wyo. Should be allowed a say in what goes on in our land. I realize it is goverment owned, but realistically how many of them will ever come out to see it or really care? Seems to me they keep trying to tell us whats best for our land and they have never heard of Grass Creek Wyo.

/s/ Connie Thull
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxx

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
BIG HORN BASIN DISTRICT

348

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

R.P. Grass Creek Resource Area Management Plan - D.E.I.S.

Dear Mr. Ross:

Management of our public lands and the unique quality of life found in the Grass Creek Resource Area are very important to the citizens of Wyoming and the Public. Therefore management of those lands must be flexible, founded on valid research, broadly considered, and provide for the maximum economic return for the Public.

The DEIS that is printed does not provide the consideration of sustaining the area at the present level of economic activity, custom, culture, livestock grazing, oil and gas development, recreation and timbering. Therefore I strongly urge you to reconsider the DEIS and provide the following in the final draft:

1. Allow increased timbering to utilize the existing 86% mature forest timber, utilizing various methods including selective cutting that will allow the maximum monetary return to the Government and local communities, wildlife protection and other recreation.

2. Expand the use of fire treatment in the entire resource area to a minimum of the average fire treatment of the past 5-10 years. (approximately 2000 acres)

3. Maintain the livestock grazing AUM'S as they are presently authorized for both the permitted sum's and actual use listed for 1990. Manage individual allotment on their own basis and not as a whole if there is a problem. You state "In general resource conditions on public lands in the planning area, including range vegetation, watershed and wildlife habitat are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced or that would warrant elimination of livestock grazing on public lands." Therefore, the proposed reductions of AUM's is NOT WARRANTED! Every effort should be made to keep ranching viable in the resource area.

348.2

4. Off Road Vehicle management must have a more clearly defined designation and have a strong enforcement program for violations. The present plan does not address this issue!

5. A predator control program must be developed and implemented for the resource area which considers livestock, wildlife and human beings. The program must consider the safety of the multiple users, and if necessary the predators should be removed or eliminated. Without such a program it will be almost impossible to expand the bird populations in the resource area.

6. The unreasonable restriction placed on the oil and gas industry in the preferred alternative should be eliminated. It appears the No Surface Occupancy and Controlled Surface Use are not warranted as these concerns are already covered by your standard lease agreement. These restrictions have an extremely severe impact on the economic stability of the area and effects revenues for the federal government, State of Wyoming and individual businesses and industries of the four counties involved with this resource area. We need to provide jobs not eliminate them!

7. Consideration and comments attempting to create more Wilderness without congressional consent is in violation of current laws; attempting to do so by declaration of the Areas of Critical Environmental Concern (ACEC) should be stricken from the document.

8. There is no valid reason to expand the Wild Horse Herd, which is now costing the taxpayers over $15 million dollars to administer the program per year. Your management should be to maintain the herd at the level of 100 horses as stated in your 1989 summary. Building roads into the area that is of such special environmental concern and expanding the number of horses is not a wise use of tax money!

9. Adequate alternatives have not been provided. 71% of the statements comparing alternatives all read "Same as Preferred." This is in violation of the National Environmental Policy Act (NEPA).

Mr. Ross, the DEIS as published is a clear attempt to reduce multiple use, particularly timbering, oil & gas development and livestock grazing. These are industries that provide significant revenues to the entire area and the Government. By your own agency

348.3

statement "the area is functioning rather well." Therefore, Mr Ross it should be your responsibility to develop a plan that maintains the resource area, that provides for enhancement of all multiple uses and not the economic degradation and disaster that the present plan proposes.

Please provide details of how you propose to incorporate these suggestions into the plan and bring some reasonableness to the DEIS.

Respectfully,

Dell Wayne Ottosen

L.U. SHEEP COMPANY dba

L.U. RANCH COMPANY
A Wyoming Corporation

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
BIG HORN BASIN DISTRICT

349

(307) 347-2002 ■ Box 690, Worland, Wyoming 82401

May 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, WY 82401-0119

Re: Comments on the Grass Creek Resource Area RMP DEIS

Dear Mr. Ross:

I am going to categorize my comments as coming primarily from two areas. First, I intend to deal with an issue which I believe has lost so much of the scrutiny of the document; that is, the lack of a BLM policy to continually update its own policies and regulations. Second, I believe the BLM continues to lay groundwork to potentially challenge private property rights through the use of innocuous appearing policy contained in the document.

There is no aspect of this work that threatens its success more than the fact that, in several areas, significant change is proposed. (This could be called the big bang approach. Only change your management document every 12 years and when you do, total all the changes you can think of into one new document.) BLM must have a successful policy of communication, consultation and coordination with the public and the users of public lands since implementation of 1981 Grass Creek MFP. Mistakes should have been so separate, and certainly no large change of policy, in this RMP. I believe this document should not be one of change, rather, it should be a compilation of changes implemented since the previous management document was written. Let me be specific.

1. On page 66, the RMP proposes to expand the wild horse area by about 31,400 acres, a 18% increase. Your previous management policy with this wild horse range has been to restrict livestock grazing to winter sleep. Even though your intent is not to change class of livestock and season of use in the expanded area, previous experience with the BLM indicates that such a change could be likely in the future. That being the case, this proposed action represents a significant change and should not have been in this document. It should have been handled as an ongoing matter between users, the public and the BLM. This RMP would

349.2

then have been the proper medium to reflect the change that could have been made previously.

2. On page 190, the RMP indicates a 35% out in grazing utilization. If this is reflective of current management policy, why has there been such an outcry? If this is new policy, it should not have been in this document. Similar to my previous observation, this issue should have been previously handled with the three C's, communication, consultation and communication.

3. On page 178, this RMP proposes to expand the "controlled surface use" designation for oil and gas exploration by more than twice the acreage from previous policy (your current management numbers don't add properly, so I am making an assumption in my calculation). Where did this come from? Why hasn't the BLM told the oil and gas industry about this before? This represents a failure of current BLM management not to have been addressing this issue on an ongoing basis.

If the BLM had truly been trying to improve their own public land policies in the past, none of the three proposed changes above would have been necessary because they would have already been included in previous efforts by the BLM. The fact that significant change is being proposed in this RMP demonstrates that the BLM is not using the three C's.

The next logical question is what does this document contain that offers a means to continuous improvement to the policies it contains. Woefully little, I'm afraid. I can find only one paragraph that defines that policy. On page 5, the RMP states "After completion, the Grass Creek RMP will be kept current through minor maintenance, or through amendments and revisions, as the demands on public lands and resources change, as the land and resource conditions change, or as new information is acquired."

I think the BLM should expand and emphasize this policy in the RMP. The present language has the appearance of being obligatory without any intent to be followed later. This RMP would do well to include a section to this subject defining how process improvement will be accomplished with a focus on the land, the user and the public.

With regard to my second concern involving private property rights, it appears to me that the RMP creates the aura of unnecessary win/lose situations in several of its existing and proposed policies. Where there's an atmosphere of the BLM winning and the private property owner losing, I just can't believe much cooperation follows. The progress that the L.U. Sheep Company has made on its range has been through cooperation with the BLM as well as the Wyoming Game and Fish Department and the State of Wyoming. It was done with a win/win attitude. It would have been difficult to do it otherwise. Again, to be specific to the RMP:

349.3

1. On page 11, the RMP states "there must be public and administrative access so sure and management actions can occur." That is a policy statement and implies access through condemnation and that is win/lose. A policy statement on access should create some flexibility for the BLM to accomplish access on a win/win basis.

2. On page 30, again on the issue of access, the RMP states "BLM would pursue a combination of motorized and nonmotorized vehicle access in the Grass Creek, upper Cottonwood Creek, and upper South Fork of Owl Creek areas." I'll make two comments about this quote. One, your response is likely to be that it is current policy and is in the BLM's MFP. Well, I say the MFP has never gone through a public hearing process and a lot of your policy is now coming under scrutiny as it appears in this RMP. Two, although the BLM has shown no inclination to condemn access in these areas, the L.U. Sheep Company found out that is only took one U.S. Forest Service supervisor to, on his own, decided to enhance economic development near the Shoshone Forest and condemn our Grass Creek road for public access. The language on page 30 is threatening to me and that is when defines an win/lose situation.

3. The expansion of the wild horse area previously discussed is a win/lose situation. There is threat of an eventual loss in grazing rights.

I have now commented on what I see are the major deficiencies of the RMP. I include now two lesser comments:

1. Reference is made in the "Dickie" Allotment on the tables on pages 233, 239, and 262. The name of that allotment is in error and should be the "L.U." Allotment. It is correct as presented on page 266.

2. Table 3-4 in appendix 3 (Ecological Condition Class and Acreage) needs a comment. The area covered by this RMP is dominated by a fire ecology. I have been led to believe that the variation of plant composition of any site on the L. U. Sheep Company ranch is influenced more by when the site was last burned (or treated by chemicals) than by any other effect. An ecological condition classification only categorizes the variation of plant composition as a site evolves from a state of just having been burned to being in extreme need of burning i.e. in that site develops a heavy cover of sagebrush, juniper and timber pine. Ecological condition classes should not, therefor, include the adjectives "poor," "fair," and "good" because fire ecology is a natural process and doesn't really address the health of the range. Poor, fair and good carry significant implication as to the health of the land and that's not proper. The RMP's ecological condition table still uses those words when categorizing this time influenced process of change. More thought should be given to changing them.

Thank you for the opportunity to comment.

349.4

Sincerely,

Mike Healy

Mike Healy

MAY 25 '95 10:21AM HCC 3087867643 P.1/1

RECEIVED

MAY - 5 1995

BUREAU OF LAND MANAGEMENT
Worland District

350

May 5, 1995

BLM
c/o Bob Ross
Grass Creek Area Draft EIS
Worland, WY 82401

Thanks for allowing the public to comment on this EIS. I have reviewed this document and believe that the writers must be isolationists or misanthropic toward their "fellow man". How about just allocating 1/2 acre per family of hunters and letting the rest of the U.S. revert to animal use only?? Ridiculous, right? Well, I believe that your approach/directives toward the Grass Creek EIS Area to be similarly absurd.

I have worked the geology of the Grass Creek Area as both a development geologist and an exploration geologist for the oil and gas industry. Your directives toward surface occupancy are short-sighted and will ultimately result in severe curtailments for the people of this region. Not only will your directives curtail/terminate future, non-disruptive seismic acquisition in the area (and thereby curtailing future exploration), but it will also negatively impact further development within existing field areas.

Why is it that the rest of the country struggles to adjust to environmental and societal changes while the offices of the Federal government have decided to stop working with the constituents of the public domain? Granted, it is much easier to preclude large areas of the public lands off limits to the public(thereby eliminating the very reason your office was created). It is a much more difficult job to listen to the desires of the public and make sound decisions based on the facts at the time of need. Is the BLM scared of the challenge to make intelligent, interactive decisions? Perhaps since your elected bosses no longer listen to the needs of the public, you feel that the BLM need not listen either. Leave lands open to the public sector. Do not let the abusive nature of a few curtail the efforts and enjoyment of all.

I work for a very cyclical industry and have seen many colleagues become unemployed, due in part to increased governmental restrictions. This industry is very carefully watched in terms of environmental awareness. Any abuses of the past are not allowed to happen in today's climate. What are the real reasons for your non-use policies for the vast majority of the public' land? Maybe you don't drive a vehicle fueled by gasoline purchased by you, or drive on highways, or heat your house, or pump your water, but I do. As a member of the public, I feel needs that your policies towards my lands do not best address. Perhaps the office of the BLM needs to be more directly accountable to the people. ANY SUGGESTIONS?

If you would like to hear my specific suggestions as to the more problematic features of your EIS study, I would be glad to voice them. As it, I cannot endorse the present effort.

Sincerely,

351

RECEIVED
MAY - 5 1995
BUREAU OF LAND MANAGEMENT
ROCK SPRINGS

May 2, 1995

BLM
c/o Bob Ross
Grass Creek Area Draft RIS
P.O. Box 119
Worland, WY 82401-0119
Fax (307) 347-6195

Mr. Ross:

I wish to comment on the very important Grass Creek Area Environmental Impact Statement (GCAEIS). Please find my comments below. In some there is my confusion, this letter is meant to be critical of the overly restrictive nature of this document, and its potential to negatively impact the entire community. Your job we viewed of these lands as multiple use, and to make them productive for the benefit of the public. You have been complete or responsive to the needs and concerns of the entire public by whom you are employed. For does your work portend good things for the future as far as the economic, cultural, and aesthetic viability of this area. The Foothill needs who reserve your home have a much flatter grasp of his domain than you do or yours.

I am specifically against the land use restrictions which I feel will unfairly burden the oil and gas industry. As far as I can determine, almost 60% of Federally-administered lands will be subject to new and stringent restrictions as a result of your work. Money, many potential restrictions seem vague and without detail, and thus open to interpretation by your employees. Your proposed restrictions will significantly increase and preclude the exploration of new gas and oil drilling, as well as limit the ability to mount an exploration campaign without a huge incremental cost of doing business. Your proposed restrictions will significantly raise the cost of drilling on an individual or marginal prospect to without the hope a producing and economically viable surface impact for a producing lease is very minor today compared to the past, and by far more environmentally responsible. Technology has created opportunities for less and less disturbance each year. Most impressive validates more than a few years old are obsolete. Your proposed restrictions will significantly reduce the number of producing leases available less of a problem with a highway that stop, rural agricultural water tank, sheepherder's trailer, or beekeepers' house. Furthermore, this surface was provided access to public lands for all Americans without the use of Federal tax dollars. My employer budgets millions of dollars in environmental spending each year, much of it unnecessary. In the long our wildlife and ranch research with those of past efforts is an indication of the closed-mindedness which that have pervaded during the formulation of this plan.

Very few government agencies make money for the American people. The BLM is in the business of making money for the American people. Your agency has been very successful while great fully managing the resources for their ultimate economic and environmental value. Your failures of increasing the cost for discovering new hydrocarbon reserves, coupled with the highest royalty rates of any other landhold in America (with the exception of Indian lands), will surely move transform your agency into another Federal Agency that will be a drain on the taxpayers, instead of contributing to the Federal paying, stable jobs for Americans. With surpluses from 60-80% of the tax base from many local communities derived from hydrocarbon extraction, the future for our area appears gloomy based on your GCAEIS, unless somehow the carrying capacity for summer visitors of the Greater Yellowstone area can be expanded by an order of magnitude. The GCAEIS needs to be re-written with the input of the local communities affected, and specifically the result for Resource-based industries by publishing this document in its present form. Your actions will not only affect Federal land, but all surrounding lands to the point of rendering them useless.

I am not necessarily for all of the tenets of the currently fashionable multiple use movement, but that movement has in part been fueled by the government's failure to distinguish between relative impacts of users of government lands. It also is a result of the government's failure to distinguish between responsible and irresponsible users. Rather than individually assess impacts and the need to control them, you have chosen to

351.2

long together all resource-based economic concerns and attempted to shut them all out or so severely hampering their operations that economic viability is impossible. For this, government scientist-politician' are paid top dollar with no accountability to their ultimate employers, the American people.

Ethical resources and innovative thinking area made the United States THE world leader. Now, much of this thinking is deep suppressed, and you are attempting to make many of our natural resources, best personnels and non-renewable, off-limits. This despite there being no proof of irreparable damage to these resources, and no proposed alternatives to interbidding. The solution is not to restrict development, but to encourage it in a way that is satisfactory to the long-term well-being of the nation. It is in this respect that your agency, and our government, is failing.

Again, please consider this comment on the GCAEIS as negative, and not in agreement with its restrictive nature. Less restrictive alternatives are needed.

Thank you for the opportunity to comment.

William Wilcox
Geologist
Consulting Company

352

WYOMING
STOCK GROWERS
ASSOCIATION

Jim King, Lander, President • Steve Pilcher, Gillette, First Vice President
Tim Wharton, Lusk, Second Vice President • Jim Hamm, Moorcroft, Treasurer • Jerry Thornton, Lander, Executive Vice President
Cindy Garrison-Weibel, Cheyenne, Executive Director

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
ROCK SPRINGS

115 EAST 20TH STREET • P. O. BOX 156
CHEYENNE, WYOMING 82003

Phone 307-635-3542
Fax 307-635-6224

May 6, 1995

Mr. Bob Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119 VIA FAX: (307) 347-6195

Dear Mr. Ross,

The Wyoming Stock Growers Association (WSGA), which represents over 1,500 ranching families in the state of Wyoming, would like to take this opportunity to comment on the draft RIS for the Grass Creek Resource Area in northwestern Wyoming.

WSGA is not in favor of a reduction in the number of AUMs available for livestock grazing, as outlined in the BLM's alternative management strategies. As a result, we find that none of the alternatives are acceptable, and would suggest the BLM consider a management alternative that does not reduce the number of AUMs available for livestock grazing.

For example, the preferred alternative would decrease forage available for livestock grazing about 38 percent and would place "temporary reductions in the amount of forage available for livestock grazing" due to surface disturbances for a variety of reasons, and to meet desired plant community objectives for wildlife habitat.

Alternative A would reduce the authorized grazing use by 30 percent, which is described further as a "moderate reduction." We do not agree that this is a moderate reduction, but rather has a significant impact. Alternative C would reduce the authorized grazing use by 24 percent, and alternative C would reduce authorized grazing use by 47 percent. As stated previously, a reduction in grazing is not an acceptable solution!

The Wyoming Stock Growers Association is supportive of the multiple use concept, however those alternatives support multiple use in name only, not in principle. All of the alternatives outlined in the draft RIS will result in a significant decrease in the amount of authorized grazing use for livestock.

Guardian of Wyoming's One Country Since 1872

352.2

In addition to a reduction in the amount of available authorized grazing, the preferred management alternative affects a significant number of grazing allotments to enhance riparian habitats, increase wild horse herd areas, and restrict water developments. As indicated in Table 16, the reduction in grazing use also has a negative economic impact to the local economy.

In light of this tremendous impact upon livestock grazing and the negative effect on the local economy, we suggest the BLM re-evaluate its options and not decrease the amount of grazing use for livestock.

Sincerely,

Cindy Garrison-Weibel

Cindy Garrison-Weibel, Executive Director
WYOMING STOCK GROWERS ASSOCIATION

MAY 05 '95 16:42 [redacted] P.2/3

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

353

Dana H. Cleland
[redacted]

May 5, 1995

Bureau of Land Management
Grass Creek Area Draft EIS
P. O. Box 119
Worland, Wyoming 82401-0119

Attn: Bob Ross

Dear Mr. Ross:

I wanted to comment on the Grass Creek Draft Environmental Impact Statement document. My comments are as follows:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber, and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below. Any Environmental Impact statement should be a balanced review and consideration of the overall environment. Environment means the whole, not just plants and animals. At present this draft is biased against people and their quality of life. This quality should be measured in jobs, taxes, ability to grow, raise a family and be able to use those offspring live and work in the area. As such, I object to the following:

a) the small amount of land considered for suburban expansion

b) the lack of discussion about impacts to the value of private, state and county lands by the various alternatives, especially those imbedded with the BLM administered lands

c) restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes

d) the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives; not enough emphasis has been placed on new technology and new information to mitigate and reclaim any

MAY 05 '95 16:43 H-CODY, WY P.3/3

353.2

impacts

e) the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in

f) the reduction of grazing AUMs proposed in the alternatives; real, current scientific data should be used to make management decisions on each allotment, and targets should be clearly established and stated.

In addition, I feel:

1) The "Wild Horse Management" areas should not be expanded, but rather, eliminated in the Grass Creek area RMP. Further, we should return all wild animal management to the State Game and Fish Department, and return all managed animal production to the private sector.

2) The descriptions for restrictions are not adequately detailed.

Sincerely,

Dana H. Cleland

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

354

Elizabeth Storer
[redacted]

May 6, 1995

Mr. Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Bob,

I write to you today regarding the BLM's draft management plan for the Grass Creek Resource Area. Clearly, there are great pressures mounting on your agency to open up all lands to mineral development and commodity production in the short term. However, I believe it is imperative that the BLM consider the long term effects of such actions that would remove restrictions needed to protect wildlife habitat and fisheries, undeveloped recreational opportunities, cultural and historical resources and water quality. Doing so will protect Wyoming's greatest assets that are the keys to the state's economic future into the next century.

Given the current congressional mood, I don't believe that designation of WSAs as Wilderness Areas is a priority that will find great support in the near future. In fact, it is quite possible that Congress will choose *not* to designate these areas as wilderness. If that proves true, under your draft management plan, these areas will be opened up to oil and gas development, hard rock mineral mining, road development and other conflicting uses. As these lands represent only 6% of all the public lands in the resource area and are the only areas that provide a semi-primitive wilderness experience, they should be protected from such development regardless of what Congress does. Otherwise, only a mere 9500 acres would be protected from development, less than 1% of the public lands in the resource area.

I wholeheartedly support the draft plan's proposal for the three Areas of Critical Environmental Concern: Fifteenmile Creek Watershed, Meetrotse Draw and Upper Owl Creek. However, to truly "protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes", I believe these areas should also be placed off limits to oil and gas leasing and mineral development. I agree with your proposal to remove some areas from hard rock mineral development, but this effort should go further by assuring protection for the lands included in the WSAs and ACECs from such development. A policy that turns lands into industrialized, single-use areas does not meet the requirements of multiple-use and sustained yield under which BLM must operate. As defined by

354.2

Congress, multiple-use includes maintaining healthy and functioning fisheries, protecting water quality and watersheds, providing opportunities for education and scientific research, recreation and aesthetic values, and preserving important historic and cultural resources. Protecting these areas will help fulfill this mandate.

In addition, the BLM needs to provide greater protection for potential National Natural Landmarks. These include the Gooseberry Badlands, East Ridge - Fifteenmile Creek Badlands and Tatman Mountain. These areas should be protected from oil and gas development and hard rock mineral development, as well as be protected with a visual resource management classification of VRM II. The South Fork of Owl Creek also should be protected from development in the river corridor and should be considered for Wild and Scenic River status.

Also, the BLM should focus more attention and resources on riparian restoration and on identifying and preventing sources of riparian degradation. A more aggressive use of CRM management techniques and time-controlled grazing practices should also be pursued.

Finally, the BLM plan should clearly provide for fish and wildlife habitat. Doing so only "to the extent possible" or "where appropriate" ranks these provisions behind all other land uses, making them marginal at best. I ask that you choose the wildlife prescriptions in Alternative C to adequately protect winter range for all big game animals.

I am aware that there are industry-supported efforts underway to attack the portions of the plan that do manage to protect some of the resources in the area from development, and that such efforts are characterizing the proposed plan as over-zealous preservationist federal nonsense that will reduce Wyoming to an uninhabited protectorate. I will argue, however, that pursuing a course that continues to emphasize the development and exploitation of natural resources at the expense of other uses will only serve to continue Wyoming's role as a colonial state, dependent upon foreign industry and markets for its economic future. These lands are public lands, for all the people, and they should be managed to serve their needs. Protecting even these relatively small areas from development and misuse will be a step in the right direction toward that effort.

Thank you for you time and consideration.

Sincerely,

Elizabeth Storer

RECEIVED
MAY 10 1995
BLM LAND MANAGEMENT
CASPER, WYOMING

355

STATE OF WYOMING
OFFICE OF THE GOVERNOR

JIM GERINGER
GOVERNOR

STATE CAPITOL BUILDING
CHEYENNE, WY 82002

May 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

Dear Mr. Ross:

Enclosed you will find comments from various state agencies on the Grass Creek Resource Area Management Plan. I am pleased to share these comments with you. In addition, my oral comments made at your hearing on April 3rd constitute a portion of the official response of the State of Wyoming.

We remain extremely concerned that the proposed action has not recognized the input of the citizens of the Big Horn Basin. Furthermore, the economic analysis of the proposed action and alternatives is inaccurate and woefully inadequate to properly reflect the potential impacts on local communities and the State.

It is my understanding that County Commissioners from the four effected counties have requested the opportunity to work with you in a process designed to correct, enhance and validate the economic analysis. The State of Wyoming is committed to working with the counties and others in this process. We are requesting that the Bureau of Land Management postpone any further action until this analysis is completed.

Following your review of this new economic data, a proposed action must be developed that is designed to meet the socio-economic needs of these communities as well as the environmental needs of the resource. We further request that a new hearing be held on this revised proposed action.

INTERNET: GOVERNOR@WYOMING.STATE.WY.US • TELEPHONE (307) 777-7434 • FAX (307) 132-3960

355.2

Mr. Bob Ross
May 5, 1995
Page 2 - Grass Creek RMP

It is my hope to be present at the next scheduled meeting between the Bureau of Land Management and the effected counties to discuss the state's involvement in this process.

Sincerely,

Jim Magagna

Jim Magagna
Federal Land Policy Director

JM:jh
Enclosures

355.3

Wyoming
Department of Commerce

Office of the State Archaeologist
Department of Anthropology
University of Wyoming
P.O. Box 3431
Laramie, Wyoming 82071
(307) 766-6561

State Identifier Number: 95-001(a)

February 22, 1995

Wyoming State Clearinghouse
Attn: Julie Hamilton
Office of the Governor
State Capitol
Cheyenne, WY 82002

Dear Ms. Hamilton:

This letter provides my comments on the "Grass Creek Resource Area Resource Management Plan" prepared by the BLM Worland District Office. My comments are restricted to one thought on ecosystem management (Page 8) and a brief discussion of the various sections pertaining to Cultural Resources. I understand that the Clearinghouse will distribute these comments.

Page 8: Ecosystems and Ecosystem Management. BLM recognizes in their definition and management objectives that humans are an integral component in ecosystems. It is commendable that they make explicit this fact. Human behavior and patterns of culture change have influenced the dynamics of Wyoming ecosystems for over 11,000 years. We cannot assume that humans have had an "impact" on the environment only since Euroamerican contact.

Cultural Resource matters are addressed on pages 103-107, 153, 189, 200, 207, and 212. Generally speaking, I believe that the pertinent issues are adequately stated. The only exception I have would be for the document to recognize the BLM has signed a Programatic Agreement (PA) with the Advisory Council for Historic Preservation and the State Historic Preservation Office. This PA is intended to streamline the Section 106 process under the National Historic Preservation Act, while still providing appropriate measures for significant cultural properties. The document was signed last year and guidelines are in place for its execution. I fully expect that Wyoming will see some benefits from this effort in 1995.

Thank you for the opportunity to comment.

Sincerely,

Mark E. Miller

Mark E. Miller, Ph.D.
State Archaeologist

Jim Geringer
Governor

Celeste Colgan
Director
Department of Commerce

355.4

Department of Commerce
Celeste Colgan, Director

THE STATE OF WYOMING
Jim Geringer, Governor

Division of Cultural Resources

RECEIVED
MAY 1 1995
BLM
GRASS CREEK
OFFICE

COPY

April 21, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401

RE: Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (State ID No. 95-001a); SHPO #1291RL0014

Dear Mr. Ross:

Staff of the Wyoming State Historic Preservation Office have reviewed the above referenced document as it pertains to cultural resources. A comprehensive cultural resource overview is presented and the Preferred Alternative offers a favorable management plan for its protection and preservation of archaeological and historic sites.

We recommend that the viewsheds at the Legend Rock Petroglyph Site and the Medicine Lodge Site be kept free of any visual intrusions to the maximum extent possible. The visual qualities surrounding these sites contribute greatly to their cultural significance. In addition, we urge the Bureau of Land Management to carefully monitor visitation to these significant petroglyph sites. Experience has clearly shown that facilitated access generally leads to increased vandalism, and that substantial investment in resources site protection/interpretation personnel and site stabilization measures may be required to remove adverse effects do not occur.

References are made to the development of cultural resource interpretive sites and public education strategies. We support the Bureau of Land Management in its efforts to increase public awareness about the significance and fragility of cultural resources. We would be pleased to cooperate with the BLM in these efforts.

Please refer to SHPO project control number #1291RL0014 on any future correspondence dealing with this project. If you have any questions contact Karen Hampton at 307-777-6292 or Judy Wolfe, Deputy SHPO, at 307-777-6311.

Sincerely,

Judy T. Wolfe

Judy T. Wolfe
State Historic Preservation Officer

JTW:kh:kw

cc: Wyoming State Clearinghouse, Office of the Governor, State Capitol Building, Cheyenne, WY 82001

State Historic Preservation Office
Barrett Building, 4th Floor 2301 Central Avenue, Cheyenne, Wyoming 82002
(307) 777-7697 FAX (307) 777-6421

THE STATE OF WYOMING

355.5

JIM GERINGER
GOVERNOR

Public Service Commission

700 W. 21ST STREET (307) 777-7427 CHEYENNE, WYOMING 82002
FAX (307) 777-5700
TTY (307) 777-7427

MEMORANDUM

STEVE ELLENBECKER
CHAIRMAN
BRIAN JAUGANSTY
DEPUTY CHAIRMAN
BILL TUCKER
COMMISSIONER

ALAN L. ELIOPULOS
EXECUTIVE SECRETARY
CONSUMER ADVOCATE
STEPHEN G. COLLET
ADMINISTRATOR

TO: MS JULIE HAMILTON
POLICY ANALYST
GOVERNOR'S OFFICE

FROM: JON F. JACQUOT
ENGINEERING SUPERVISOR
PUBLIC SERVICE COMMISSION

DATE: MARCH 24, 1995

RE: BUREAU OF LAND MANAGEMENT GRASS CREEK
RESOURCE AREA MANAGEMENT PLAN, STATE
IDENTIFIER NO. 95-081(a)

Please forgive the laziness of this response to your request to comment on the referenced matter. The Commission requests that no unreasonable restrictions be placed on the provision of utility service or on the construction of utility and pipeline facilities as a result of the implementation of the proposed plan.

The Commission would prefer that the Bureau of Land Management avoid mandatory undergrounding of electrical utility facilities as a management objective. The cost of constructing, operating and maintaining underground lines is generally higher than the cost of comparable overhead facilities and the reliability is not as good. The Commission's general policy is that those who cause the higher costs of undergrounding electrical lines should pay the difference. If the additional costs are not borne by those who cause them, the ratepayers of the affected utility would be unfairly discriminated against when burdened with paying the additional costs.

The Commission requests that, where mineral leasing is being done, the costs of relocating any utility and pipeline facilities to accommodate mineral production be borne by the lessee. If these costs are not borne by the lessee, those costs would fall unfairly on the ratepayers of the affected utility or pipeline.

355.6

The Commission requests that, in cases involving oil and gas leasing, the Bureau of Land Management not restrict the construction of utility and pipeline facilities necessary for the exploration and production of oil and gas.

The Commission requests that, when the Bureau of Land Management sells or exchanges lands, the rights of the utilities and pipeline operators holding right-of-way easements from the private landowner and right-of-way grants from the Bureau of Land Management be protected. The Commission suggests that the private land owners acquiring Bureau of Land Management lands give new right-of-way easements to the utilities and pipeline operators for their existing facilities, and that, when the Bureau of Land Management acquires private lands, it issue new right-of-way grants to the utilities and pipeline operators for their existing facilities.

Where construction is undertaken, the Bureau of Land Management or those managing the construction should contact and coordinate with the utilities and pipeline operators serving and otherwise present in the area to prevent contact with and damage to utility and pipeline facilities. If it becomes necessary for utility or pipeline facilities to be modified or relocated, the cost of modifying or relocating any utility and pipeline facilities to accommodate construction, should be borne by the Bureau of Land Management or those benefiting from the construction. If not, those costs would fall unfairly on the ratepayers of the affected utility or pipeline.

The Bureau of Land Management should make provisions requiring those with timber operations to contact and coordinate with the utilities and pipeline operators serving or otherwise present in the area to prevent contact with and damage to utility and pipeline facilities. This should also apply to those clearing future right-of-ways. Consideration should also be given to the establishment of utility corridors through timbered areas, with maintenance of cleared areas for construction.

RECEIVED
APR 14 1995
GOVERNOR'S OFFICE

WYOMING
GAME AND FISH DEPARTMENT

Jim Ringer, Governor — John Talbott, Acting Director

355.7

April 12, 1995

ZIS 6163
Bureau of Land Management
Worland District Office
Draft Environmental Impact
Statement
Grass Creek Resource Area
Resource Management Plan
EIN: 95-081(a)

WYOMING STATE CLEARINGHOUSE
ATTN: JULIE HAMILTON
OFFICE OF THE GOVERNOR
STATE CAPITOL
CHEYENNE, WY 82002

Dear Ms. Hamilton:

The staff of the Wyoming Game and Fish Department has reviewed the draft environmental impact statement for the Grass Creek Resource Area Resource Management Plan. We offer the following comments for your consideration pursuant to the National Environmental Policy Act.

Terrestrial Considerations:

The draft ZIS is well written and addresses most of our scoping comments (Joe White's letter of 12/30/91). The preferred alternative is a good balance between commodity use and environmental protection. It places greater emphasis on resource protection than Alternative A ("no action" -- existing management under the 1983 Management Framework Plan) or Alternative B (commodity emphasis), yet is not nearly as restrictive as Alternative C (non-commodity emphasis). Our specific comments follow:

1) RE: Page 21 and Map 4, Page 88 (fire suppression) -- Limited wildfire suppression is proposed on 744,400 acres of public land and full suppression is proposed on 219,800 acres. In recent years, most prescribed burns designed to enhance wildlife habitat (e.g., Cottonwood, Blue, Grass Creek) were done in the full-suppression zone on Map 4. Given continued budget declines and the trend to seek outside funding (e.g., RMEF), it seems costs could be reduced by managing wildfire

Headquarters: 5400 Bishop Boulevard, Cheyenne, WY 82006-0001
(307) 777-4600

355.8

Ms. Julie Hamilton
April 12, 1995
Page 2 - ZIS 6163

to achieve the objectives of prescribed burns where opportunity permits. For example, the current plan would require full suppression of a fire in the Knos Creek drainage. Yet, prescribed burns are planned there in the next few years. Prescribed fire is an important tool for accomplishing resource management objectives, but should not exclude the possibility of managing wildfire. We suggest flexibility to manage wildfire where appropriate, to achieve the objectives of prescribed burns.

2) RE: Page 26 (Aspen Management). The preferred alternative indicates silvicultural practices and timber harvest would emphasize improvement of aspen when possible. We support this objective because aspen is important habitat for many species of wildlife. In fact, we recommend BLM attempt to increase acreage of aspen stands in addition to maintaining existing stands.

3) RE: Page 26 (Security Cover). Forest management should consider size and effectiveness of residual security areas as well as the size of cut areas. Recent literature suggests at least 250 acres of contiguous uncut timber are necessary to function effectively as security cover. Road management can sometimes lessen the impact of too little hiding cover; BLM should continue to recommend road management policies designed to improve/maintain effectiveness of residual cover.

4) RE: Page 29 (Public Access). The preferred alternative states BLM will work to maintain or improve existing opportunities for public access. The RMP should state this includes foot and horseback access in addition to vehicular access. Motorized access is not necessarily a high priority in many parts of the planning area, but foot/horseback access is. We will continue to support BLM's efforts to secure and improve public access.

5) RE: Pages 32-33 (Land Exchanges). The RMP lists general areas where exchanges would be pursued. Land exchanges can be designed to benefit both the private landowner and public resource users. We encourage BLM to develop a streamlined, more efficient land exchange process. Improved efficiency and shorter processing times would be supported by landowners/permittees, and by sportsmen groups, other agencies, and the public where the outcome secures protection of important public resources or improved access.

There are existing circumstances in which subdivision of important wildlife resources could take place if exchanges are not completed soon. Any land ownership adjustments should evaluate potential loss of important wildlife habitat or other negative impacts to wildlife resources before being pursued.

6) RE: Pages 36-42 (Grazing Monitoring). The RMP will continue grazing management similar to ongoing practices. There will be no adjustments in amounts, kinds, season of use, authorized preference, etc., without monitoring data and consultation/negotiation with permittees and other affected interests. Effective monitoring is essential. We support more active involvement of permittees in monitoring, but BLM must ultimately assure proper monitoring and grazing practices.

7) RE: (Combined Utilization Levels). The preferred alternative identifies guidelines to conserve residual forage in important big game seasonal habitats; we support this. Without specific data to allocate forage in each allotment, adherence to utilization levels is a reasonable alternative. However, we recommend specific utilization thresholds rather than ranges, particularly in arid sites. The thresholds should be the lower end of the current ranges specified. For example, 35% utilization would be more appropriate than a range of 35-50%.

8) RE: Page 44 (Wildlife Mitigation and No Surface Occupancy). The preferred alternative establishes different levels of habitat protection through various leasing stipulations. WGFD participated in developing these. Under 23% of the planning area (20,200 acres) is recommended for leasing under a stipulation of "no surface occupancy" (NSO). This includes the Bighorn River corridor, Legend Rock cultural site, South Fork Owl Creek Canyon, and high-elevation ridge complexes at the extreme southwest. These areas have inordinate wildlife value. The NSO designation maintains the option for exploration and future oil extraction with improvements in horizontal-drilling technology. WGFD supports BLM's NSO recommendation for the 20,200 acres.

9) RE: (Protective Stipulations). Controlled Surface USE (CSU) and Timing Limitations (TU) are designed to avoid or minimize conflicts that inevitably happen when APDs are submitted for drilling in sensitive habitats. CSU

stipulations cover less than 12% of the planning area (138,800 acres) and TL stipulations cover 34%. The preferred alternative applies protective stipulations throughout approximately 46% of the planning area; therefore 92% would be available for leasing under Standard Terms and Conditions. We support BLM's application of these stipulations. To avoid protracted analyses and conflicts, industry should be notified at the outset where stipulations apply and the specific terms of those stipulations as is currently accomplished through the lease sale process.

10) RE: Pages 47-49 (ORV Management). The preferred alternative identifies 4 special recreation management areas (SRMAs) (see Map 18, page 95) where off-highway vehicle use would be limited to designated roads and trails. ORV use would be restricted to existing roads and trails elsewhere throughout the planning area, except vehicle use would be prohibited within the Duck Swamp interpretive site, Worland rifle range, and pending Wilderness Study Areas (WSAs). This mix of permitted uses will maintain or increase opportunities for ORV use while lessening conflicts with other resource values. We support this type of management and encourage BLM personnel to rigorously enforce ORV restrictions so they are effective. This is especially critical during high-use periods including fall hunting seasons, holiday weekends, etc.

11) RE: Table 2 (Recreation Management Reservoirs). Table 2 addresses the need for facility development (e.g., trail heads, boat ramps, campgrounds) and interpretive signing in various locations throughout the planning area. We support these efforts, which are often jointly funded. We believe limited development of facilities would be beneficial at Wardell and Herrington Reservoirs, which are small and cannot accommodate a large increase in use. We also recommend completion of facilities at Harrington Reservoir before development of the fishery. In particular, access to this reservoir should be controlled with a designated parking area.

12) RE: Pages 55-61 (Vegetation Objectives). Desired Plant Community (DPC) objectives have been defined for several native plant communities and wildlife seasonal habitats. This was a cooperative effort. The approach seems valid, measurable, and should help prioritize monitoring, habitat treatments, and use of personnel time.

13) RE: Page 66 (Wild Horse Management). Under the preferred alternative, BLM would increase the Wild Horse Management Area (WHMA) by approximately 28% (31,400 acres). The additional area extends north of the current WHMA and is heavily used by wild horses. The herd size objective would remain between 70-160 mature animals until revision of the wild horse management plan is completed. The management plan emphasizes gathering strays outside the designated WHMA and those that wander onto private lands. Additional water sources developed within the expanded WHMA would benefit pronghorn and other wildlife in the area. We encourage BLM to maintain horse numbers at the low end of the range of 70-160 adults, in part because persistent drought has reduced plant vigor in recent years.

14) RE: Pages 69-73 (WGFD Herd Objectives). The preferred alternative states BLM will maintain or enhance habitat for existing and WGFD objective wildlife populations. RMP should acknowledge these objectives are periodically reviewed and may change based on habitat conditions, public input, and consultation with federal land management agencies. The following statement would be more appropriate: "BLM will provide suitable habitat and forage to meet WGFD strategic plan population objectives which are developed through public input and consultation with federal land management agencies, and are based upon habitat capability and availability."

15) RE: Page 76 (ACEC Designations). The preferred alternative would create an ACEC on 17,100 acres of public land in the upper Owl Creek drainage (see map 21, page 102). This corresponds closely with the 20,200-acre NSO designation (excludes South Fork Owl Creek canyon). ACEC status will focus management emphasis on the unique wildlife habitat which exists there. Another ACEC (274,200 acres) described for the Fifteenmile drainage (Page 74) would be managed similarly to the "Save Ocean Lake" campaign which has been highly successful in Fremont County. A primary objective is to reduce sediment problems within the Fifteenmile drainage. This effort will be costly, long-term, and rather comprehensive. We support the proposed ACEC designations. The final RMP should include discussions of management actions planned to rehabilitate the Fifteenmile watershed so

the reader gains a better understanding of the scope of this effort. We request to be a major participant in the design/conduct of special projects in this drainage.

16) RE: Table 3 (Constraints on Surface Disturbing Activities). Management constraints intended to benefit wildlife include measures to protect overlapping and important big game crucial winter ranges and parturition areas, sage grouse leks, raptor nests, and riparian habitats along the Bighorn River. We support these provisions.

17) RE: Pages 103-152 (Corrections).

i. Page 109 (Access). No agreement has been reached among WGFD and affected landowners regarding road management along the upper South Fork of Owl Creek.

ii. Page 111 (Rights-of-Way). The three proposed actions should be updated to reflect recent accomplishments.

iii. Page 119, Tables 6 & 7 (Recreation Use). It is not clear how the figures presented in Tables 6 and 7 (page 119) were calculated. For the final RMP, we recommend BLM recreation planners contact the WGFD for up-to-date figures that can be included in these tables.

iv. Page 131 (Aspen Distribution). Text indicates the planning area contains approximately 200 acres of aspen on public land. This underestimates current aspen distribution; the figure should be checked and revised.

v. Page 134 (Bighorn Sheep Winter Range). Winter browse requirements are described collectively for bighorn sheep, mule deer, and pronghorn. Sheep have substantially different winter browse needs and should be listed separately.

vi. Page 139, (Wild Horse Objectives). Text indicates, "With an October 1991 estimate of 158 horses in the WHMA, the herd appears in good condition although range conditions are generally rated as static or downward in trend." If recent drought conditions have contributed to this downward trend, the herd should be managed at the lower end of the 70-160 adult horse objective until range conditions improve. We suggest incorporating this provision.

353.13

Ms. Julie Hamilton
April 12, 1995
Page 7 - EIS 6163

vii. Page 150 (T&E Species, Grizzly Bears). The section on grizzly bears vastly understates the amount of grizzly activity in the planning area. The western portion of the area is Situation 5 habitat; however, grizzly presence on the Wood River and Gooseberry Creek has increased markedly in the past 5 years. Observations have extended into the Middle Fork of Owl Creek. BLM should clearly acknowledge the bear situation and make preparations for dealing with bear habitat issues in coming years.

viii. Page 150 (T&E Species, Wolves). Wolf observations reported in the past 20 years have been along the fringe or edge of the planning area rather than the western quarter. It is certainly possible wolves could disperse from Yellowstone into the western edge of the planning area within the next 10 years. This should be considered in the analysis.

ix. Page 150 (T&E Species, Candidate Species). We recommend the final EIS/RMP incorporate the Biological Assessment on T&E species (prepared by BLM). Our Non-Game Section in Lander should also be consulted.

18) RE: Page 187 (Biological Diversity). The conclusion that biological diversity, overall forest structural diversity, and associated habitat values all decline as forests grow older is a generalization. Diversity can (and does) increase in areas where varying ecological conditions are intermingled and direct succession accordingly.

The BLM has done a good job of identifying and addressing issues and concerns which we (and others) identified during scoping. Many of the actions recommended to benefit wildlife were developed jointly by the BLM and WGFD through local coordination. Successful implementation will depend on continued support and cooperation between BLM and WGFD.

Aquatic Considerations:

The Grass Creek Resource Area contains several streams that range from WGFD Class 3 to Class 5 trout streams. Several of these waters are important fisheries on a regional level within the state or at a local level. The Resource Area is bordered by a Class 1 section of the Bighorn River. Class 1 trout streams

354.14

Ms. Julie Hamilton
April 12, 1995
Page 8 - EIS 6163

are considered fisheries of national importance. Besides trout fisheries, many of these streams serve as important habitat for Wyoming's native minnows and suckers.

Although alternative C would provide the greatest benefits for fisheries resources, the additional benefits appear to be negligible compared to the preferred alternative. Therefore, we can support the implementation of the preferred alternative from the fisheries standpoint.

We strongly encourage and support the improvement of range conditions as well as riparian conditions. Such improvement would reduce sedimentation and avoid or minimize related fishery impacts. Well developed riparian zones provide a variety of benefits to all water-related resources and users. These benefits include, though are not limited to bank stabilization, improved water quality, improved fish habitat, elevated water tables, increased bank storage capacity, higher late summer stream flows and higher forage production.

It has been our experience that stipulations on oil and gas leases do not always adequately protect fisheries resources. Stipulations often provide protection during exploration but fail to provide adequate protection during field development and production. We recommend BLM, through the RMP, identify measures to address this concern.

We support the emphasis the BLM has placed on acquiring access to public lands near the Bighorn and Greybull Rivers. We would only suggest that any new road development be constructed in such a manner as to minimize potential erosion in these watersheds.

When exploring the possibility of developing islands in reservoirs for waterfowl habitat, consideration should be given to designs and locations that will not result in a large increase in piscivorous bird populations that could be detrimental to fish populations in the area.

The BLM had recognized Fifteen Mile Creek as the largest contributor of sediment into the Bighorn River. We support land management actions that the BLM is proposing to improve riparian areas and water quality in this drainage. We hope that the BLM will continue to work with WGFD and others in identifying and implementing land management actions that can further alleviate the sedimentation problem.

355.15

Ms. Julie Hamilton
April 12, 1995
Page 9 - EIS 6163

It would be beneficial if the Wild and Scenic Rivers designation process was better explained. It is unclear to us how the Wood River could not qualify for consideration for Wild and Scenic status. We are not implying that the Wood River should be considered, only that we would like to see the rationale for not qualifying for consideration.

Thank you for the opportunity to comment.

Sincerely,

JOE WHITE
DEPUTY DIRECTOR

JW:TC:ss
cc: Wildlife, Fish, HMTS Divisions

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RIVERTON, WYOMING

356

WYOMING FARM BUREAU FEDERATION
P.O. Box 1348
Wyoming 82070 • (307) 745-4925

May 2, 1995

BLM
Attn: Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

The following are the comments of the Wyoming Farm Bureau Federation on the Draft Grass Creek Environmental Impact Statement (DEIS). The Wyoming Farm Bureau Federation is a non-profit general agricultural organization dedicated to helping agriculture producers. Many of our members are federal permittees in the Grass Creek Resource Management Area. We feel impacts of the proposals outlined in the DEIS would harm agricultural producers.

As a representative of the livestock industry we find the document treats livestock and the ranchers that manage them as "second class citizens." On page 7 of the document, under the General Criteria section, the DEIS lists as a consideration, "Livestock grazing practices that are compatible with other resource management objectives." We maintain why livestock grazing is being singled out to measure for compatibility. Why aren't other multiple uses compared to their compatibility to livestock grazing? Section 1502.14 of the Council on Environmental Quality (CEQ) Guidelines require that the alternative section of the EIS be the "heart of the environmental impact statement." However, alternatives which are based only on how livestock grazing can be compatible with other resource management objectives does not provide the public with adequate information on which to base a sound decision. The DEIS, also under that same section, seeks opportunities for enhancing recreation. The DIES doesn't provide any information about enhancing other multiple use activities, which seems, appears to violate the requirements of § 1502.14 of the CEQ Guidelines.

Under the Selection of Preferred Alternative section on page 7 of the DEIS, it claims that the preferred alternative answers the question "Is there consistency with land use and resource management plans, programs, and policies of other federal agencies, state and local governments, and Native American tribes (emphasis added)?" The Sweetwater Plan for Wyoming's Agricultural Industry (1990-2000) (hereafter referred to as the Plan) lists as a limiting factor of beef production "Federal policies which limit grazing" (Plan, page 24) and "Federal land policies limit expansion of sheep ranges" (Plan, page 37) as a limitation for sheep production. One of the Plan's goals for the beef industry is to insure no net loss of federal and state AUMs. One goal listed for the sheep industry is to increase stock sheep numbers to 1.8 million head. The DEIS appears to ignore this Plan and instead of seeking to enhance livestock production, as outlined in the Plan, it seeks to reduce or eliminate livestock grazing. No attempt appears have been made to address issues and problems for livestock producers in the Grass Creek Resource Area.

In Wyoming call 1-800-442-8325

356.2

Under this same section of the DEIS, the document discusses improving the management of ecosystems that cross administrative boundaries and sustaining the productivity and diversity of ecosystems. There are no maps, however, nor any documentation on where these ecosystems are and which ecosystems the BLM is supposed to sustain. One of the basic requirements under NEPA, as outlined in Sierra Club v. Morton, 510 F. 2d 813, 820, (5th Cir. 1975), is that the process is intended to make the NEPA "an environmental full disclosure law." The lack of definitions for ecosystems does not allow for objective measurement of ecosystem productivity and diversity. Without an objective measure, the full environmental impacts cannot be measured--nor even guessed at.

Page 8 of the document elaborates further upon ecosystem management, but it doesn't provide the reviewing public with any better understanding of the concept.

Page 8 of the document also discusses the development of mitigation needs. The document is unclear as to what the BLM considers a "surface-disturbing and other disruptive activities." It is unclear in the definition section whether normal animal husbandry practices such as fence repair or construction, water development or even grazing would be considered a "surface-disturbing" activity and need to be mitigated. Mitigation measures could add a significant cost to grazing on federal lands, which in turn would affect how grazing is carried out in the resource area. The document needs to indicate more precisely what government officials considered a "surface-disturbing" activity and which activities are not considered surface disturbing activities. If "surface-disturbing" activities will be applied consistently to agricultural practices, then the DEIS needs to address the economic and environmental impact such an action would have.

On page 11, under Issue 1: Vegetation Management the document states that "Reduction in vegetation and undesirable changes in plant composition can affect forage availability, wildlife habitat, and overall plant and animal diversity." The document doesn't provide the reader with any information on current plant and animal diversity trends for the RMP area. The same problem exists for Issue 2: special Management Area Designations. In this section, the document states "In some places, unique resources and biological diversity are in danger of being lost; in other places, special management may be required to protect a natural process or ecosystem..." (emphasis added). Again, no question what base line data is used to determine trends for these special management area designations. What level is the BLM using to determine whether biological diversity is in danger of being lost? Without this information provided, the public cannot make an informed decision, nor can land managers, which is a clear violation of § 1502.16 of the CEQ Guidelines.

The statement in paragraph 1 on page 14 of the document continues to carry forward the idea that livestock grazing is considered a "sacrifice use" on the public lands. The document requires managers to allow livestock grazing as long as the livestock don't "excessively conflict with other management objectives. The term "excessively conflict" is not defined, however the intent of the DEIS is clear, in that if other uses cannot co-exist with livestock, livestock will go. It is questionable whether that type of action reflects the wishes of Congress to manage the federal range in a multiple use fashion.

356.3

Under Table 2 on page 19, the document says that adverse effects would be avoided on land and resource values listed in the National Park Service inventories. The document is silent as to where these areas might be and to what extent there are "possible National Natural Landmarks" which will be avoided. The public is left to speculate on how many such landmarks exist in the area, where these landmarks might be located and what these landmarks are. The public is also left to wonder what "adverse effects" are going to be avoided. Based on the lack of information provided in the document, one cannot help but wonder how the document complies under Table 16 on page 175 that "There would be no significant adverse effects on lands and resources identified by the NPS as possible National Natural Landmarks."

Table 2 on pages 20 and 21 of the document suggest that limited suppression of fires would occur in much of the resource area and on page 22 of the document travel restrictions for fire suppression on lands north of Highway 431 would occur. Table 16 of the document ignores the environmental consequences of this action, so again the public is left to speculate as to what the consequences are for this decision. For example what happens if a fire occurs on private land, and the private landowner seeks to immediately extinguish this fire but it spreads to public land in a limited fire suppression area, with travel restrictions. Will the landowner or local governmental agencies be asked to pay for the additional costs associated with fighting a fire under such restrictions? If so, what impact will this have on local governmental entities?

On page 24 of the document, the authors state, "The management of forest and woodland resources would be consistent with ecosystem management principles." Which principles might these be?

Under the landownership adjustment section of Table 2, we read that the BLM will pursue purchase of 16,000 acres of privately-owned land (page 33). We question why the BLM finds it so important to acquire private land, but places severe restrictions on transfers of the public domain to private hands, even though such transfers would greatly facilitate private land management decisions. Reciprocity does not seem to be a factor.

Table 3 on page 35 states that a management objective for livestock grazing is to "Improve forage production and range condition to benefit livestock, wildlife, wild horses and watersheds." (emphasis added). We find no requirement that wildlife and wild horse management be used to benefit livestock. Why? Indeed we find that in Table 16, on page 178, livestock AUMs will be reduced 43,850, or around 35%. We question why this document tries to mislead the public into believing that livestock grazing will be managed to benefit livestock, when it is apparent that wildlife and wild horses are the beneficiaries of these reduced AUMs.

On page 36, Table 2, the document states that "The level of actual livestock grazing would not exceed active preference. Currently active preference is 101,451 AUMs per year." The document does not provide an analysis as to the difference between active preference and authorized use. Again, we refer back to the state Plan for agriculture, which recommends extension of the state's sheep numbers and no loss of federal AUMs, and we question what attempts the BLM has made to work with livestock producers, local and state officials to achieve the goals outlined in the Plan.

356.4

Pages 40 and 41 point out that livestock grazing will be restricted or limited on over 365,000 acres to accommodate wildlife. We find no such requirement for wildlife. It is clear that livestock will be cut and restricted to benefit wildlife.

We find the DEIS leans heavily in favor of recreation development, with no clear indication as to what the potential need for recreation truly is. In Table 2, page 49, the document wants to "enhance opportunities for primitive recreation." The 1990 State Comprehensive Outdoor Recreation Plan (SCORP) suggests that resident participation in primitive recreation activities is stable to downward trending (SCORP, page 35). The Table 15 Assumptions for Analysis By Alternative for recreation management (page 168) also points out that the BLM will increase camping by 85%, hiking by 81% and sightseeing by 102% over current estimated levels. Again the 1990 SCORP document states that "Noticeable decreases in camping, sightseeing, and picnicking are noted."

In addition, there are other errors in the recreational aspect of the document.

ESTIMATED RECREATIONAL USE FOR CALENDAR YEAR 1990 ON ALL PLANNING AREA LANDS is shown in Table 6 (Pages 118-119). This table FOR ALL LANDS IN THE PLANNING AREA indicates that use is 236,400 Visitor Use Days. ESTIMATED RECREATIONAL USE FOR CALENDAR YEAR 1990 ON PUBLIC LANDS IN THE PLANNING AREA is shown in Table 7 (Pages 119-120). This table for PUBLIC LANDS IN THE PLANNING AREA indicates that use is 81,173 Visitor Use Days. Thus these two tables reveal that only 31.65 percent of the Visitor Use Days are on Public Lands. A footnote at the end of Table 6 indicates "Extrapolations of the amount of nonconsumptive and consumptive use taking place on all lands in the planning area are based on the professional judgement of BLM recreation specialists." Table 7 contains a footnote which indicates "Extrapolation of the amount of nonconsumptive and consumptive use taking place on public lands in the planning area are based on professional judgement of BLM recreation specialists." Strangely, the BLM has failed to point out that fully 55.35 of the Visitor Use Days on all planning area lands is fishing, with the data in the DEIS indicating only 4 percent of the Visitor Use Days involved in fishing occurred on public lands. Table 9 (Page 128) indicates Stream System Total Miles are 1299 and Stream System Public Miles are 506 (or 38 percent). This Table is very unclear because it shows the miles for the Big Horn River (as a total of the drainage ?) but does not break-out the miles of the Big Horn River itself in the planning area. Table 10 (Page 129) fails to identify public miles by DEQ Class or WQ&F Class, which prevents the public from being able to assess the government's contentions with any degree of reliability.

Table 6 is claimed to be an estimate of the recreational use on all planning area lands, while Table 7 is said to be an estimate of the recreational use on public lands in the planning area. The data from these Tables appears on page 123, but is attributed to the "four county area". It is impossible to determine from reviewing the EIS what the actual situation is. Therefore the reader of the EIS is left to speculate about the veracity of the document. It is impossible to respond to these inconsistencies.

356.5

The document on page 69, Table 2, indicates that a management objective is to maintain or enhance habitat for existing and Wyoming Game and Fish (WG&F) Department "objective" wildlife populations. We question why this is being done.

Wildlife--The EIS (Page 190) indicates AUMs will be reduced for adjustments from constraints protecting elk, moose and bighorn sheep habitat, but the government has failed to show that there is a demand greater than the objective numbers of these species. The 1991 Annual Report of the WG&F Department reveals that hunter numbers are below the objective number in most of the areas near, or adjacent to, the planning area. If harvest is not going to be a mechanism for regulating numbers, then the government is planting for objectives which have no logical basis. The planting area is not an island surrounded by water. It is contained within an area where choices can be made. For example the 1991 WG&F Annual Report indicates the following for the State of Wyoming:

	Population Objective	1990	Hunters Objective	1990
Pronghorn	384,660	413,243	90,303	41,528
Elk	73,433	82,128	39,195	48,810
Mule deer	513,550	545,793	156,794	86,145
Moose	11,825	12,767	1,679	1,883
Bighorn sheep	8,395	7,069	515	374

The 1990 population for pronghorn, elk, mule deer and moose exceeded the objective number. The objective for 1990 exceeded the number of hunters for pronghorn, elk, mule deer and bighorn sheep. The EIS is devoid of any information explaining what the specific population or hunter objectives are for the planning area, which also means there is no indication of how this "island" is going to be managed to reach those objectives. The reader cannot be expected to guess as to what management is being planned for the area. While the EIS refers to a WG&F Strategic Planning document that document does not identify the objectives for the planning area as such. Therefore it is impossible to determine how the data found in the DEIS was arrived at.

Table 14 on "BIG GAME POPULATIONS IN CRITICAL WINTER RANGE AND BIRTHING RANGE, 1990" reveals little, until it is subjected to further calculation. These calculations reveal that of the 98,870 acres of critical winter range for Bighorn sheep, elk and moose, only 31,779 acres are public lands, or only 32.1 percent. This would indicate 67.9 percent are on private or other lands. For birthing range, the calculation indicates only 13,775 of 55,100 acres are on public lands, or 25 percent, while 75 percent are on private or other lands. For all species shown on Table 14, public lands account for 54.25 percent of the lands which are critical winter range, and 30.9 percent of the birthing range is on public lands. Therefore the federal government's

Grass Creek DEIS Comments
WyFB
page 6

356.6

desire to impose livestock grazing constraints for Bighorn sheep, elk and moose are unfair, given the fact that most of the critical winter habitat and birthing areas exist on lands which are not public lands. Reductions of livestock grazing on public lands, which impose a burden on the other lands, has not been addressed in the EIS. We request that such an analysis be provided.

Because the DEIS has many serious inadequacies, we feel this document needs to be rewritten and reissued as a Draft Environmental Impact Statement after the inadequacies are addressed.

Thank you for the opportunity to comment on the document.

Sincerely,

Ken Hamilton

Ken Hamilton,
Administrative Assistant

c.c. Congressional Delegation
Ron Michel
WSGA
WWGA

357

Wyoming Resource Providers Coalition
Darrell Barnes
District Manager
Bureau of Land Management
PO Box 119
Worland, WY 82401-0119

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

May 4, 1995

Dear Mr Barnes

The Wyoming Resource Providers Coalition (WRPC) would like to express further concern over the content of the Grass Creek Draft EIS. Within the document, the BLM fails to give credit to the technologies used by industries which benefit the environment. The DEIS contains unreasonable restrictions on the oil & gas industry in the Preferred Alternative. It gives absolutely no consideration to the development and use of new technologies and no credit or value is assigned to produced water and wildlife habitat developed from oil and gas activities.

The DEIS not only restricts industry access, but at the same time, it will cause a significant loss of dollar revenues to all four counties (Park, Hot Springs, Washakie, and Big Horn). The BLM has not given any consideration to the economic impacts that will affect the people of the Grass Creek Resource Area or the state's economy. The BLM needs to consult with these counties and their concerns must be considered. The BLM should provide these counties with economic studies that address the economic impacts created by the adoption of the DEIS within each county.

There is an inadequate range of alternatives from which to choose. For example, 71% of the statements comparing the alternatives all read, "*Same as Preferred.*" This violates the National Environmental Policy Act. Also, not only is the DEIS biased against oil & gas leasing, it is clearly bias AGAINST grazing. The Preferred Alternative reduces grazing by 25 percent. This is totally unreasonable!

The BLM is reducing the public access even further by managing areas, such as Upper Owl Creek and Badlands Red Canyon Creek, as Wilderness, without congressional consent. They are not wilderness areas and should not be considered as such. These defacto wilderness areas negatively impact motorized recreation.

In general, the WRPC would like to see the BLM work with the counties to produce an alternative or plan that will protect the communities economic stability and ability to survive. The DEIS should be rewritten to incorporated these issues.

Sincerely,

Dallas Sioux Valder

Dallas Sioux Valder
State Coordinator

P.O. Box 748 - Laramie, Wyoming 82070 - (307) 745-0996

358

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

May 2, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

Below are comments of the Petroleum Association of Wyoming (PAW), a division of the Rocky Mountain Oil and Gas Association with respect to the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (Draft EIS). PAW, a division of the Rocky Mountain Oil and Gas Association (RMOGA), represents a membership which accounts for over 95% of the oil and gas exploration, production and transportation in the state of Wyoming.

PAW appreciates the time and effort spent by BLM in preparing the Draft EIS as well as an opportunity to provide the oil and gas industry's input to a planning document which will determine the future of the oil and gas industry to access the Grass Creek Resource Area for exploration, production and transportation activities. However, specific concerns with the Draft EIS, as discussed with you during our meeting on March 20, are reiterated below.

Wyoming has been blessed with an abundance of natural resources. Since 1884, the oil and gas industry has explored, drilled, produced and transported its products. The industry has successfully cohabitated with wildlife, endangered species, and wild and scenic rivers. Industry does not believe the Preferred Alternative, contained in the Draft EIS, acknowledges those accomplishments by arbitrarily doubling the use of restrictive lease stipulations in the Grass Creek Resource Area.

Specifically within this document, we do not support the general statement that there "appears to be sensitive or conflicting resource values" which apparently justifies BLM's need to expand oil and gas leasing or operational restrictions. Therefore, the general statement does not meet the analysis or policy requirements outlined within NEPA. PAW failed to identify a discussion within the Draft EIS of specific resources to be safeguarded nor a discussion of the perceived conflicts between the specific resource and oil and gas activities. An examination of the less restrictive measures must be a fundamental element of the discussion within the Draft EIS.

359

PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association

PETROLEUM ASSOCIATION OF WYOMING

951 Warner Cook Blvd. 100
Casper, Wyoming 82601
(307) 234-5333
fax (307) 266-2189

Richard T. Ronzello, Executive Director
Cathy Schulze, Office Manager
Thomas H. Cronson, Associate Director
Katherine G. Sommer, Associate Director

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

May 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P O Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

Below are comments of the Petroleum Association of Wyoming (PAW), a division of the Rocky Mountain Oil and Gas Association with respect to the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (Draft EIS). PAW, a division of the Rocky Mountain Oil and Gas Association (RMOGA), represents a membership which accounts for over 95% of the oil and gas exploration, production and transportation in the state of Wyoming.

PAW appreciates the time and effort spent by BLM in preparing the Draft EIS as well as an opportunity to provide the oil and gas industry's input to a planning document which will determine the future of the oil and gas industry to access the Grass Creek Resource Area for exploration, production and transportation activities. However, specific concerns with the Draft EIS, as discussed with you during our meeting on March 20, are reiterated below.

Wyoming has been blessed with an abundance of natural resources. Since 1884, the oil and gas industry has explored, drilled, produced and transported its products. The industry has successfully cohabitated with wildlife, endangered species, and wild and scenic rivers. Industry does not believe the Preferred Alternative, contained in the Draft EIS, acknowledges those accomplishments by arbitrarily doubling the use of restrictive lease stipulations in the Grass Creek Resource Area.

Specifically within this document, we do not support the general statement that there "appears to be sensitive or conflicting resource values" which apparently justifies BLM's need to expand oil and gas leasing or operational restrictions. Therefore, the general statement does not meet the analysis or policy requirements outlined within NEPA. PAW failed to identify a discussion within the Draft EIS of specific resources to be safeguarded nor a discussion of the perceived conflicts between the specific resource and oil and gas activities. An examination of the less restrictive measures must be a fundamental element of the discussion within the Draft EIS.

359.2

951 Werner Court, Suite 100
Casper, Wyoming 82601

Mr. Bob Ross
Page 2
May 5, 1995

Therefore, BLM has not complied with these requirements and has failed to comply with NEPA requirements and BLM Manual 1624 - Supplemental Program Guidence for Fluid Minerals.

Page 16 Cultural, Paleontological, and Natural History Resources Management

The Draft EIS indicates that historic resources within ten oil and gas fields would be managed for scientific and public use. The purpose of the program appears to focus on improved knowledge of the historic significance of the fields and to facilitate the approval of future development and reclamation activities. However, in a letter dated July 20, 1994, (attached) to Mr. Mike Bies, PAW posed several questions regarding this program which have yet to be answered. Specifically:

1) How does BLM justify this reallocation of time and resources when areas such as southwest Wyoming are in desperate need of archaeological surveys for APD's, Rights-of-way, etc.?

2) Explain the need to examine these fields for listing.

3) Clarify the benefits derived from listing these fields. Would there be any incentives to spur operator participation? How would designations affect post-production abandonment procedures?

4) How does BLM plan to handle the National Historic Preservation Act (NHPA) Section 106 consultation requirements to consider possible effects of undertakings on listed districts, sites, buildings, structures or objects, especially when the proposed new operation is the same or similar in scope to prior activities and operations? Specifically, will BLM impose restrictions that inhibit an operator's ability to replace or update old equipment or to pursue new technology which might extend production?

Because of BLM's failed response to PAW's letter, we do not support this program.

Page 34 - Rights-of-way

Industry supports the preferred alternative approach to rights-of-way management along routes to Yellowstone National Park. However, these rights-of-way must not be subject to increased restrictions to protect scenic values.

359.3

951 Werner Court, Suite 100
Casper, Wyoming 82601.

Mr. Bob Ross
Page 3
May 5, 1995

Page 61 - DPC Objectives for Sage Grouse Nesting Habitat

Under the preferred alternative, BLM would impose a limit on total surface disturbance to less than 20% in sage grouse habitat. It appears the 20% objective would include habitat affected by direct surface disturbance and areas affected by indirect and human presence activities. Does the 20% objective baseline data assume optimum habitat or does the best science available used to prepare the Draft EIS indicate a percentage closer to the 20% objective? Certainly if the disturbance area was already at 20% then clarification as to whether other multiple-use activities would be subject to a "no surface occupancy" constraint, or is energy and mineral activities the only use to bear the burden.

Industry can find no basis offered in the Draft EIS for such potentially burdensome mitigation. Therefore, we oppose the impact threshold concept and favor a case-by-case analysis which takes into account site-specific opportunities for mitigating adverse effects on sage grouse.

Page 74 - Special Management Areas

Many of the proposed Areas of Critical Environmental Concern (ACEC) have significant potential for oil and gas exploration and development. According to the US Bureau of Mines 1990 Known Mineral Deposit Areas (KMDA) for Oil and Gas in Wyoming indicates the Grass Creek Resource Area to contain High Value KMDA and Moderate-Value KMDA. High value is defined as an area that includes mineral deposits (developed and undeveloped) and mineral occurrences having cumulative productions and/or identified resources of more than $1 million. Moderate value is defined as an area that includes mineral deposits (developed and undeveloped) and mineral occurrences having cumulative production and/or identified resources less than $1 million.

The criteria within BLM's Manual 1613 requires ACEC's to have specific relevance and importance in order to qualify for designation. Because industry is unclear how these proposed designations meet the criteria described in BLM Manual 1613, and regardless of the relevance in terms of resource values as described on pp. 151 & 152 we remain opposed to any new designation of ACEC's.

Page 76 - Geophysical Miscellaneous Resources

Rather than prohibit geophysical activity on snow or frozen ground, PAW recommends language consistent with the approved statewide Programmatic Agreement for Geophysical Operations. The revised Programmatic Agreement currently under consideration states "if snow cover in any 100 ft x 100 ft area in the 'area of potential

359.4

951 Werner Court, Suite 100
Casper, Wyoming 82601

Mr. Bob Ross
Page 4
May 5, 1995

affect' is greater than 30%, Class III inventory of that area is precluded." Industry supports BLM adopting the revised Programmatic Agreement language for the Draft EIS.

Page 79 - Wildlife Resources

Industry emphatically opposes the creation of a Controlled Surface Use stipulation which would place seasonal limitations on the operation and maintenance of oil and gas producing facilities in newly discovered fields. This proposed stipulation would apply to approximately 61,000 acres of winter ranges, birthing areas and migration corridors (page 191). No justification for a CSU is provided in the Draft EIS, other than "additional security would be imposed for big game species and their predators."

Advanced technology and successful mitigation measures, such as: submersible pumps, automated facilities and road access controls are used without resorting to a seasonal break in operations. Therefore, the Draft EIS must consider advancements in oil and gas technology (i.e. introduction of CO_2 injection wells). Additionally, there is no supporting documentation offered to confirm such restrictions would result in any additional benefits to wildlife.

On page 82 - Wildlife, soil and water, vegetation, and scenic resources

Industry cannot support a "no surface occupancy" stipulation in an area with moderate to high potential for oil and gas (1990 US Bureau of Mines KMDA) when the Draft EIS has not adequately addressed where mitigation measures have failed in this area and therefore, are left with no alternative but to restrict oil and gas exploration and development. PAW supports timing limitation stipulations where appropriate.

Page 122 - Affected environments, Socioeconomics

A comprehensive analysis of the socio-economic benefits of oil and gas development activities in the resource area must be a major component of the decision-making process. However, the information provided appears to play an insignificant role in the development of the preferred alternative. It is obvious at a moment's glance that the four proposed alternatives will impact access for oil and gas exploration and production. Consequently, with each alternative, tax and royalty revenues to communities will be impacted.

PAW recommends the Draft EIS compare, in its socio-economic analysis, the costs of administering the minerals program as well

359.5

951 Werner Court, Suite 100
Casper, Wyoming 82601

Mr. Bob Ross
Page 5
May 5, 1995

as industry's financial contributions to local, state and federal treasuries. The analysis must also include a risk assessment and cost/benefit analysis to determine whether the benefits outweigh the risks of allowing less restrictive oil and gas development in the resource area. A copy of the Expanded Moxa Arch Area Natural Gas Development DEIS's section on socio-economics is attached as an example of a framework to develop an analysis which reflects the benefits of oil and gas in the Grass Creek Resource Area.

Page 273 - Appendix 4 - Gas and Oil Reasonably Foreseeable Development (RFD)

Natural gas is becoming the energy of choice for many because of its clean burning qualities. Therefore, the race is on to produce from areas containing high concentrations of natural gas. Demand for gas is expected to continue rising, as a result of new technologies, expanding research and development projects, and due to a more environmentally conscious society. However, BLM needs to update the geologic information used to develop the RFD analysis because it does not reflect recent industry focus on gas development. Updated information is needed before decisions effecting opportunities to explore for and develop oil and gas resources are made.

Page 295 - Glossary

A Controlled Surface Use definition needs to be added to the Glossary Section of the Draft EIS. We were unable to identify a definition in this section.

Page 299 - References

During PAW's March 20 meeting with BLM, you mentioned that numerous publications and sources were used in the decision making process. However, only 7 are cited in the Draft EIS. All references should be contained in this section, please review and update.

Comments Directed Towards Appendix MR - as distributed during PAW/BLM meeting on March 20, 1995.

Page 2 - Requirement: Surface-disturbing activities would be limited or avoided within 500 feet of surface water and(or) riparian areas. BLM discusses a 500 foot avoidance of surface water and(or) riparian area. Industry has proven its ability to conduct best management practices near streams and/or wetlands without degrading the quality of water or causing soil erosion. The forest products industry conducts its business within 250 feet of streamside zones and has proven, through best management

951 Warner Court, Suite 100
Casper, Wyoming 82601

Mr. Bob Ross
Page 4
May 5, 1995

practices, natural resources industries are sensitive and responsive to maintaining water quality. Unless BLM has scientific evidence to justify any avoidance area regardless of historical practices, PAW strongly opposes the arbitrary 300 foot buffer zone restriction of surface water and/or riparian area.

Page 7 - Requirement: Based on site-specific environmental analyses, surface-disturbing or disruptive activities would be prohibited during certain period of the year within 0.5 mile of raptor nests or the visual horizon of nests, whichever is closer. The factors and decision/decision criteria appear to be nonapplicable to the requirement and suggest a rewrite.

Page 8 - Requirement: Based on site-specific environmental analyses, surface-disturbing or disruptive activities would be prohibited on overlapping and important big game crucial winter ranges, migration corridors, and parturition areas. The statement contained in the decision/decision criteria where "no exceptions will be granted...would block or disrupt animal migrations" leave industry with serious concerns. Ridge tops are generally most topographically acceptable areas to drill. Will BLM allow occupancy on steep slopes or narrow canyon bottoms in these situations? Only science-based facts and decisions should play into this proposed requirement.

Page 12 - Requirement: Seasonal restrictions will be applied to surface-disturbing activities or disruptive activities and land uses in areas within 0.5 mile of raptor nests or visual horizon of nests, whichever is closer. The "no surface occupancy" restriction for big game crucial winter range and "seasonal" restrictions placed on raptor nests appear to be transposed. This issue needs to be reviewed and corrected.

General Comments

BLM must also address how the Draft EIS will affect existing lease rights. BLM policy provides that existing lease rights cannot be changed by a new plan. Voluntary compliance to the new plan should be sought from lessees if activities are initiated. Regardless, BLM should specify in the Draft EIS if and how valid existing lease rights could be impacted by new leasing decisions. Specifically, potential conditions of approval for operations and other changes should be identified.

The Draft EIS should clarify BLM's policy on visual resource management requirements applied to federal lands or to BLM-approved mineral development on split-estate lands. It BLM's understanding that surface uses on split-estate lands are determined by the surface owner and not the federal government.

951 Warner Court, Suite 100
Casper, Wyoming 82601

Mr. Bob Ross
Page 7
May 5, 1995

In conclusion, the federal deficit has topped $4.5 trillion. Congress must aggressively seek a more streamlined government, and work with natural resource industries to promote extraction of domestic resources in an effort to stabilize economies and reduce the deficit. History has proven extraction of natural resources can be accomplished in an environmentally sound manner for the good of Wyoming, its residents and its wildlife.

BLM appreciates the opportunity to comment on the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement (Draft EIS). The petroleum industry looks forward to maintaining its long standing partnership with the BLM in the Grass Creek area and the state of Wyoming. 1

Sincerely,

Kathy Springer

Kathy Springer

Attachments: 1) PAW letter to Mike Sims dated 7-20-94
2) Expended Moxa Arch Nat. Gas Development DEIS pp 3-73 through 3-79

cc: US Senator Alan Simpson
US Senator Craig Thomas
US Congressmen Barbara Cubin
Governor Jim Geringer
John Wunnicke
Dave Petrie
Terry Rimmo
Claire Moseley

PETROLEUM ASSOCIATION OF WYOMING
a division of Rocky Mountain Oil and Gas Association
951 Warner Court, Suite 100
Casper, Wyoming 82601
(307) 234-5333
fax (307) 266-2189

Richard T. Ristevitz
Executive Director

Cathy Schultz
Office Manager

Thomas H. Clayton
Association Director

Katherine C. Springer
Associate Director

July 20, 1994

Mr. Mike Sims
Bureau of Land Management
Worland District Office
P O Box 119
Worland, Wyoming 82401-0199

Dear Mike:

Thanks to you and Dave for taking the time to meet me in Shoshoni to talk about the nomination of oil fields to the National Register of Historic Places. There were several initial questions raised during our conversation as expressed by various members of Petroleum Association of Wyoming (PAW). We would appreciate clarification to the following issues:

1) The oil and gas industry has spent literally millions of dollars to obtain cultural resource clearance because we understand that BLM has limited archeological manpower. How does BLM justify this reallocation of time and resources when areas such as southwest Wyoming are in desperate need of arch surveys for APD's, rights-of-ways, etc.?

2) Please explain the "need" to examine these fields for listing. Judging from the rhetoric associated with development of land use plans and expensive environmental group opposition to industry projects, we are unsure there is public support for designation and maintenance of fifty year old fields for our purposes. People in the oil and gas industry are proud of their role and contributions to Wyoming history. However will industry is to saving representative examples of their lifework for prosperity, many in the general public do not share that sentiment.

3) Please clarify the benefits derived from listing these fields. Would there be any incentives to spur operator participation? For example, would BLM waive current operator requirements, such as facility painting to preserve the "look and feel" of settings? Will there be interim reclamation and field abandonment requirements for listed fields while they continue to produce? How would designations affect post-production abandonment procedures? BLM should clearly identify, discuss and resolve outstanding issues with affected operators prior to taking action to list any producing field.

951 Warner Court, Suite 100
Casper, Wyoming 82601

4) How does BLM plan to handle the National Historic Preservation Act (NHPA) Section 106 consultation requirements to consider possible effects of undertakings on listed or eligible districts, sites, buildings, structures or objects, especially when the proposed new operation is the result of BLM's decision to prior activities and operations? Specifically, will BLM impose restrictions that inhibit an operator's ability to replace or update old equipment or to pursue new technology which might extend production?

We discussed, during our meeting, the idea of a BLM "Petroleum Museum" which would highlight local and regional geology, history of production, exploration and production techniques and new technology. BLM might include identification of benefits associated with the energy industry, important events and people, and self-guided outdoor tours through historic equipment. Industry might know of various oilfield equipment which could be used in the museum. Of course we'd have to identify what type of equipment/artifacts would best be suited in a "Petroleum Museum", where the equipment/artifacts are currently located, who owns them and are the individuals and/or companies willing to house them in a museum.

We also talked about the existing efforts of folks in Worland and Thermopolis who are actively working to preserve the oil and gas industry's history. You mentioned Greybull as a potential location. Let's try to get together, tour these sites, and talk about industry's role in providing additional "historic" artifacts that would highlight industry's role in Wyoming.

Mike, thanks again to you and Dave for meeting me in Shoshoni. We appreciate that BLM recognizes the importance of the oil and gas industry to Wyoming. Let's make sure we preserve the past, but allow for development to continue in the future. Let me know what your schedule looks like for a tour!

Sincerely,

Kathy

Kathy Springer

cc: J.S. Raschick
Bob Anderson

[Included with this letter were pages from the Expended Moxa Arch Area Natural Gas Development DEIS - April 1985 -ED.]

360

BIG HORN RANCH
DeLoyd & Lorraine Quarberg

713 West Sunnyside Lane Thermopolis, Wyoming 82443 307/864-5778

May 5, 1995

Bureau of Land Management
Bob Ross, Team Leader
P.O. Box 119
Worland, WY 82401-0119

RE: Gross Creek Resource Management Plan

Dear Mr. Ross:

I am opposed to the Gross Creek Management Plan as proposed in the Draft EIS (EIS) dated September 1994, and wish the objection as noted for the following reasons.

The EIS treats agriculture as a second class user. Page 7 Livestock grazing predicates that are compatible with other resource management objectives." We question why livestock grazing is being singled out to measure for compatibility. Discrimination is continued on page 14 paragraph 1.

EIS does not consider the Strategic Plan for Wyoming's Agricultural Industry 1995-2000. (Plan). The Plan lists as a serious factor of beef production "Federal policies which limit grazing" (Plan, page 24) and "Federal land policies limit expansion of sheep ranges" (Plan, page 37) as a limitation for sheep production. One of the Plans goals for the beef industry is to insure no net loss of federal and state AUMs. One goal listed for the sheep industry is to increase stock sheep numbers to 1.5 million head. The EIS appears to ignore the Plan and instead of working to enhance livestock production as outlined in the Plan, intends to reduce or eliminate livestock grazing.

The EIS suggests improving the "ecosystems" is an important management consideration but it doesn't provide us with maps defining which "ecosystems" will be managed.

The EIS (page6) discuss the development of mitigation needs. The document is unclear as to what the BLM considers a "surface - disturbing and other disruptive activities". It is unclear in the definition section whether normal animal husbandry practices such as fence maintenance construction, water development or even grazing would be considered a "surface-disturbing" activity and would need to be mitigated.

The EIS discusses management for "biological diversity" without providing baseline data as to what level of "biodiversity" the managers are going to manage for. What measurements will

360.2

Bureau of Land Management
Page 2
May 5, 1995

determine whether BLM is successful or unsuccessful? Is this a "ride to the horizon" management goal?

The EIS on page 35 says that a management objective for livestock grazing is to "improve forage production and range conditions to benefit livestock, wildlife, wild horses, and watersheds." (emphasis added). We could find no requirement that wildlife and wild horse management be used to benefit livestock. WHY? Indeed we find that in table 16, page 176, livestock AUMs will be reduced to 43,850 or about 35%. We question why this document tries to mislead the public into believing that livestock grazing will be managed to benefit livestock, when it is apparent that wildlife and wild horses are the beneficiaries of these reduced AUMs.

We find the EIS leans heavily in favor of recreation development with no clear indication as to what the potential need for recreation really is. In table 2, page 49, the report wants to "enhance opportunities for primitive recreation." The 1990 State Comprehensive Outdoor Recreation Plan. (SCORP) suggests that resident participation in primitive recreation activities is stable to downward trending (SCORP, page 36). Table 15 "Assumptions for Analysis by Alternative" for "Recreation Management" (page 168) also points out that the BLM increase camping by 68%, hiking by 81% and sightseeing by 122% over current estimated levels. Again, the 1990 SCORP document states that "Noticeable decreases in camping sightseeing, and picnicking is noted."

The EIS (page 190) indicates AUMs will be reduced for adjustments from constraints protecting elk, moose, and bighorn sheep habitat, but there is no evidence to show there is a demand greater than the objective numbers of these species. The 1991 Annual Report of the Wyoming Game and Fish Department (WGAF) reveals that the hunter numbers are below the objective number in most of the areas near, or adjacent to, the planning area. If harvest is not going to be a mechanism for regulating numbers, then the government is planning for objectives which have no logical basis. The planning area is not an island surrounded by water. It is contained within an area where choices can be made. For example, the "1991 WGAF Annual Report indicates the following for the State of Wyoming:

	POPULATION		HUNTERS	
	Objective	1990	Objective	1990
ANTELOPE	384,880	413,243	60,303	41,328
ELK	73,433	82,128	59,185	46,810
MULE DEER	515,550	540,763	158,794	86,145
MOOSE	11,825	12,787	1,679	1,683
BIGHORN SHEEP	8,385	7,069	515	374

The 1990 population for antelope, elk, mule deer and moose exceed the objective numbers, while the objective for 1990 hunters exceeded the actual number of hunters for the same species. The EIS is devoid of any information explaining what the specific population or hunter objectives are for the planning area, which also means there is no indication of how this "island"

360.3

Bureau of Land Management
Page 3
May 5, 1995

is going to be managed to reach those objectives. We cannot be expected to guess what management is being planned for the area. While the EIS refers to a WGAF Strategic Planning document, that document does not identify the objectives for the planning area. Therefore, it is impossible to determine how the data found in the EIS was arrived at.

In summation, it would appear to me that there is no evidence to indicate a change in the present system is needed. The range is in better shape than it has been for many years and is continuing to improve. This demonstrates that the farmer and rancher, the stewards of the land, realize the need for and are making changes for the betterment of the land. Wildlife populations as indicated above, have grown to some of the highest numbers ever recorded in our States history, preving that wildlife, livestock, timber, minerals, and recreation can and do thrive together.

The livestock, timber and minerals industry are the users that "pay their way" regarding the public lands and they are the ones that are being restricted or eliminated in some cases. These are also the industries that contribute most to our economy, providing jobs and our tax base, yet are given the least, if any serious consideration. WHY?

The emphasis appears to be "what needs to be done to increase the wildlife population," yet I found no mention of predator control. The fox and coyote populations have become so abundant that they are rapidly devouring the game birds plus they are having an increasing effect on the number of deer and antelope fawns that survive. I see this on nearly a daily basis on my small ranching operation, surely it has not gone unnoticed in the research for the EIS, why was it ignored? In spirit of the unwritten intent or agenda that one of the main purposes of wildlife is to feed the predators and now this even more demanding wolf?

THE DRAFT EIS IS INACCURATE, INCOMPLETE AND INADEQUATE. IT NEEDS TO BE WITHDRAWN AND RECON P

Yours truly,

DeLoyd S. Quarberg

RECEIVED
NOV - 8 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

361

May 4, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

As citizens of the Big Horn Basin, we truly enjoy the wildlands of the badland country that surrounds our home. We, therefore, encourage you to place the most emphasis on managing the Gross Creek Resource Area to the benefit of wildlife, fish, and environmentally sound riparian areas and rangeland. We do not want to see the rancher "thrown off" the land, but we do want Our land to be strictly managed for good soil and habitat. Grazing use should be subordinate and compatible with wildlife as the top priority.

Please do not open Wilderness Study Areas to mining, oil and gas development, or motorized vehicle use. These are some of our favorite places to find peace and solitude, and we don't want them ruined.

We care about the future of our land and don't want it sacrificed to the oil, gas, and mining industry. Please implement policies that will prevent its degradation and preserve it for the future. Yes, preservation is the key to a healthy earth for us and for our children.

Sincerely,

Jennifer S. Miller

Jennifer S. and Neil O. Miller

362

5/5/95

Pennoyer and Son Inc.
Owl Creek Rt.
Thermopolis, WY 82401

To. Worland BLM, Bob Ross, RMP Team Leader.

We have 3 allotments, 0613, 0614, 0615 we own in the Grass Creek Resource area plus lease 2 other allotments 0775, and 0775 in this area. Grazing is our biggest concern but, multiple use and oil and gas are right there with grazing. From what you have listed in parts of the preferred alternatives and other alternatives, there could be drastic economical problems in the 4 counties that the resource area management plan encompasses. Over 50% of the other alternatives read "same as the preferred".

The suitability tables on Pages 251-254 need to be taken out of the draft. If these tables are used there would be drastic economical problems for users. Also this information is not correct because on one of the actual grazing use 5 year periods we were in drought one year and had to take half of our stock to Powder River for grazing. On 2 of our mountain allotments these tables show a 50% out in AUM's. A 10% cut in a spring and fall allotment where we hven't even taken 30% utilization during the grazing period. We feel that your tryint to manage for wildlife and not livestock on the mtn. allotments. We have no argument with the BLM's right to make adjustments in AUM's if they have the data

(1)

[page 2]

to support such adjustments, and the data is based on research actually done out on the range or land. Also another option that the BLM never considered in the draft was coordinated resource managment (CRM), which should be considered if they are looking to address all the alternatives in grazing.

Dad came to this part of the country in 1939 and we didn't have hardly any deer, elk or ant. in this area. Now we have lots of game and predators so we must be doing something right with our management. But by your Preferred Alternative it reduces livestock grazing by 29%, so it look like your against grazing and livestock in general. Like on page 37, paragraph 1 under preferred alt. what is the definition of excessive soil erosion or poor vegetation or definition of wildlife rubbers. You can not plan ahead with statement like these. Paragraph 3, page 37 you also need data to support this statement. Page 39 paragraph 3 Preferred Alt. you don't want solid numbers because it looks both the BLM and permittee to a solid percent for the next 10 years or however long it takes. Page 40 paragraph 4 Preferred Alt. seems water development would benefit both wildlife and livestock so why restrict it.

On recreation management Page 52 paragraph 1 in preferred alt. we feel we don't need trailheads or more people coming into this area, we favor Alt. A. Also paragraph 6 on this page, the signs are nice, but alot of the

(2)

[page 3]

time they get some people lost in the back country or they use the road in the winter time and become stranded.

Oil and gas exploration has to many restrictions being imposed on them. They bring in a large percentage of income to the 4 counties. The mountain country or upper Owl Creeks should have more restrictions than the elevations because of the times you can get to these

362.2

areas. But what your proposing could cause a large dollar change in the method of extracting oil from this area, and all of the land users will feel this economic impact.

Some mistakes we have found are on Page 110, thermap of roads, the upper road on North Fork of Owl Creek is not a County road. page 269 allotment 0573 which we lease, doesn't have any developed springs that we know of on 990 acres of contour furrow. On page 109 under Land and Realty paragraphs 3 and 4, so your kooooooooowledge these are not any exclusive easement or agreements for public access to the South Fork of Owl Creek across our lands.

Sincerely
Pennoyer and Son Inc
/s/ Arnold Pennoyer

363

RECEIVED
MAY - 8 1995

WILLISTON BASIN
INTERSTATE PIPELINE COMPANY
A Subsidiary of MDU Resources Group, Inc.

P.O. Box 291
Moorcroft, WY 82732
(307) 939-7580

May 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, WY 82401-0119

Re: Resource Management Plan
Grass Creek Resource Area

Dear Mr. Ross:

Williston Basin Interstate Pipeline Company (Williston Basin), a owner and operator of approximately forty miles of underground natural gas pipeline and associated facilities within the Grass Creek Resource Area. Due to this interest we hereby respectfully submit the following comments concerning the Bureau of Land Management's Draft Environmental Impact Statement (EIS) for the Grass Creek Resource Area dated September 1994.

Williston Basin's primary concern is maintaining the ability to satisfy natural gas market demands. This involves maintaining our existing pipeline system as well as possible future system upgrades. Such efforts may entail activity in the Grass Creek Resource Area, on pipeline systems currently existing on federal surface under rights-of-way grant permit numbers WYC-044777, WYC-043125, WYW-022023 and W73143. The transportation and marketing of oil and natural gas via underground pipeline systems is arguably the least environmentally disruptive of transportation options. Table 8 on page 126 of the EIS appears to grossly exaggerate the potential long-term impact from pipeline transportation. With modern pipeline construction techniques, it is hard to comprehend how an underground pipeline can impact such a small loss relative to activities such as access road development. It is equally puzzling that such impact can be considered permanent given consideration to modern reclamation procedures. Excluding the initial, short-term construction phase, underground pipelines have very little impact on visual, noise and air quality values. For this reason, Williston Basin would like to go on record as opposing any restrictions or additional burdens which may evolve from this scoping process that would affect future pipeline activity.

Williston Basin would like to thank the BLM for providing this opportunity to be involved in the decision making process.

Respectfully submitted,

Williston Basin Interstate Pipeline Company

Allen Johnson

Allen Johnson
Manager
Safety and Environmental Affairs

364

May 5, 1995

Bob Ross R.M.P. Team Leader
Re: Grass Creek REsource Area, Resource Management Plan Draft Enviromental Impact Statement.

I think the Wilderness Study Areas should be abolished. The B.L.M. is trying to create those areas and set them aside strictly for wild life preservation. This is not multiple use. The BLM is assuming too much authority by way of regulations, restrictions and specifications. This is unconstitutional. They (BLM) make policies and pass them off as laws. All policy making should include county and state commissions. Also no cuts in AUMs anywhere in G.R.A. The Riparian areas should be left as is for the same reasons as W.S.A. Absolutely no fencing off of any water or water ways in G.R.A.

/s/ Mary Vass

365

xxxxxxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxx
5/5/95

BLM__Bob Ross;

I agree with everything Arnold Pennoyer put in his letter about alotments, 0613, 0614, 0615. We've practiced conservative stock manage-ment and developed water resources. Never have abused the land like some I have witnessed.

I have watched your different tactics through the years--always trying to change something--then as another plan crops up--and still nothing works-I guess.

I feel the Department of Interior is trying to break the west - make a complete wild animal resort - I suggest you put radio collers on all of you plan these different groups that know so much - so we can track your boris.

I'm totally against this Grass Creek Reserve plan - You're restricting our power lines, minerals & oil, grazing and everything else. When there is no revenue coming in our four counties will be flat busted May your wages also and I hope BARBIT too.

Sincerely

/s/ La Vonne Pennoyer

366

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RIVERTON

HOT SPRINGS COUNTY FARM BUREAU
THE GEM OF AGRICULTURE
51a Arapahoe Street Thermopolis, Wyoming 82443

May 5, 1995

District of Land Management
Bob Ross Team Leader
P.O. Box 119
Worland WY 82401-0119

RE: Grass Creek Reserve Management Plan

Dear Mr. Ross:

The Hot Springs Co. Farm Bureau, representing 115 members, is opposed to the Grass Creek Management Plan as proposed in the Draft EIS-FEIS dated September 1994, and wish the objection we noted for the following reasons.

The EIS treats agriculture as a second class user. Page 7 "Livestock grazing practices that are compatible with other resource management objectives". We continue why livestock grazing is being singled out to measure for compatibility. Discrimination is continued on page 14 paragraph 1.

EIS does not consider the Strategic Plan for Wyoming's Agricultural Industry 1990-2000 (Plan). The Plan lists as a limiting factor of best production "Federal policies which limit grazing" (Plan page 24) and "Federal land policies have restricted of stimy target" (Plan page 37) as a limitation for sheep production. One of the Plans goals for the beef industry is to assure we not loss of federal and state AUMs. Our goal listed for the sheep industry is to develop sheep numbers to 1 million head. The EIS appears to ignore the Plan and instead of seeking to enhance livestock production as outlined in the Plan, it seeks to reduce or eliminate livestock grazing.

The EIS suggests improving the "ecosystem" is an important management consideration but it doesn't provide us with hope outlining which "ecosystem" is being improved.

The EIS (page8) discuss the development of mitigation needs. The document is unclear as to what the BLM considers a "surface-disturbing and other disruptive activities". It is unclear as the decision section whether annual ground surface disturbance would be considered a "surface-disturbing" activity, and would need to be mitigated.

The EIS discusses management for "biological diversity" without providing baseline data as to what level of "biodiversity" the managers are going to manage for. What assessments will determine whether BLM is successful or unsuccessful? Is this a "fade to the horizon" management goal?

The EIS on page 33 says that a management objective for livestock grazing is to "improve forage production and range conditions to benefit livestock, wildlife, wild horses, and watersheds." Emphasis added. We could find no management that wildlife and wild horse management be used to benefit livestock. WHY? Indeed we find just as table 24, page 174, livestock AUMs will be reduced on CRMS or about 10%. We assume why the document tries to pretend the public area following into livestock grazing will be managed to benefit livestock, when it is apparent that wildlife and wild horses are the beneficiaries of these reduced AUMs.

366.2

Bureau of Land Management
Page 2
May 5, 1995

We find the EIS letter heavily in favor of recreation development with no clear indication as to what the potential need for recreation really is. In table 2, page 89, the report states in "enhance opportunities for primitive recreation." The 1991 State Comprehensive Outdoor Recreation Plan (SCORP) suggests that outdoor participation in primitive recreation activities is similar to downward trending (SCORP, page 32). Table 15 "Assumptions for Analysis by Alternatives" for "Recreation Management" (page 138) also points out that the BLM increase camping by 85%, hiking by 41% and sightseeing by 102% over current recreation levels. Again, the 1991 SCORP document states that "Noticeable decreases in camping, sightseeing, and picnicking is noted."

The EIS (page 190) indicates AUMs will be reduced for adjustments from constituents protecting elk, moose, and bighorn sheep habitat, but there is no evidence to show there is a demand greater than the objective numbers of these species. The 1991 Annual Report of the Wyoming Game and Fish Department (WG&F) reveals that the hunter numbers are below the objective numbers in most of the areas near, or adjacent to, the planning area. If harvest is not going to be a mechanism for regulating numbers, then the government is planning for objectives which have no logical basis. The planning area is not an island surrounded by water. It is surrounded within an area where choices can be made. For example, the 1991 WG&F Annual Report indicates the following for the State of Wyoming.

	POPULATION		HUNTERS	
	Objective	1990	Objective	1990
ANTELOPE	384,660	412,242	93,503	41,538
ELK	73,435	82,128	59,195	48,810
MULE DEER	515,250	542,793	156,394	86,145
MOOSE	11,823	13,767	1,675	1,883
BIGHORN SHEEP	8,395	7,669	515	374

The 1990 population for antelope, elk, mule deer and moose exceed the objective numbers, while the objective for 1990 hunters exceeded the actual number of hunters for the same species. The EIS or derived of any information explaining what the specific population or hunter objectives are for the planning area, which also means there is no indication of how the "related" is going to be managed to reach those objectives. We cannot be expected to guess what management is being planned for the area. While the EIS refers to a WG&F Strategic Planning document, the document does not identify the objectives for the planning area. Therefore, it is impossible to determine how the data found in the EIS was arrived at.

THE DRAFT EIS IS INACCURATE, INCOMPLETE AND INADEQUATE. IT NEEDS TO BE WITHDRAWN AND REDONE.

Yours truly,

Arnold Pennoyer, President

367

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RIVERTON

VANDERHOOFF

Bob Ross
BLM Team Leader
P.O. Box 119
Worland , WY 82401

COMMENTS ON GRASS CREEK DEIS

Dear BLM Grass Creek EIS team:

Please accept the following considered opinions to help form you final management plan for the Grass Creek resource area. Although I live in "Hot Springs County", I have spent most of my time in the Grass Creek Mountains due to their unique qualities, and the Badlands of the central Big Horn Basin in the Fifteen Mile basins are also personal favorites.

BIG HORN SHEEP HABITAT: I full well believe that upper Owl Creek (both forks), Cottonwood Creek, and other areas on the east slopes of the Bugh Mountains have supported much larger Big Horn sheep populations in centuries past than can now seen today. My feeling is that sometime in the late 19th and early 20th centuries free domestic livestock growers all but eliminated the resident Big Horn populations east of the Washakie Wasatch/ Twin Peaks. Because of uncontrolled and uncharitable grazing practices by the early exploiters, the entire range formale for Big Horns was hopelessly viewed against them, as well as other big game species. The BLM Grass Creek plan should offer a more substantial goal of Big Horn sheep recovery by reintroductions and habitat improvements, even if that means a net loss of high country summer grazing AUMS.

Still visible today in the Owl Creek Mountains are the remains of pre-Columbian big horn sheep traps converging lanes of deadfall fences leading into cul-de sacs. Therefore, Big Horns once roamed over a larger area , and should be given the opportunity to do so in the future, to a greater extent than any of the alternatives proposed in the DEIS.

PREDATOR CONTROL: I consider any program on public lands to control predator populations to be an area of environmental concern, yet I see no mention in the DEIS on predator control. Was this omitted on purpose? Is it outside the scope of the EIS? If so, why? It is hard to comment on something that's not there...

My greatest concern on the predator issue is the sound management of Mountain Lion populations in the Owl Creek Mountains with respect to deer herds and the aforementioned Big Horn sheep situation.

OIL & GAS LEASING: In recent decades I have been disturbed to the point of outrage over the BLM's indiscriminate issuance of oil leases in the Upper Owl Creek area. Abuses and/or lack of enforcement of environmental stipulations in the past should not be allowed to become status quo policy. Please recall the high elevation fisher rig that sat on top of the north fork of Owl Creek in the S. Fk. of Owl Creek drainage in sight of the Washakie Needles in the early 1980's; and the B-400 rig which drilled on the North Fork of Owl Creek near Bear Leaf Mountain (on a State lease). Neither of those rigs should have been allowed surface occupancy (but for different reasons...) In the case of

367.2

DEIS Comments/ Page 2

the former, the rig was allowed to "winter over" on [the ridge] above 11,000 feet, and numerous environmental abuses went unreported, such as fuel spills, for lack of supervision and enforcement. It was a half-baked ill concieved idea to allow the rig up there in the first place.

The B-WAB operation obviously violated Eagle Nest Ranch property rights when the oil company was allowed to force a road thru the middle of the ranch, thru the middle of the buildings even! across private land in order to reach the state lease via BLM roads and lands. If there was ever an abuse of oil leasing overriding other interests, you need to look no further than Eagle Nest Ranch, Owl Creek...

I have a very hard time swallowing the argument stated by the oil companies recently that they are being shortchanged on leasing opportunities in the Grass Creek area, and that tens of millions of dollars in tax revenues will be lost to local and county governments because of leasing restrictions. The "BIG PICTURE" of oil and gas leasing activity in recent years and the petroleum industry's past and present operations on at all level in all locations (including offshore and international) makes their arguments rather hollow and self-serving.

The oil industry is lobbying hard to retain leasing opportunities on every square millimeter of land everywhere in the Grass Creek area and elsewhere, even when they know full well that exploration and development impacts other resources in a very negative way. The proposal to allow leasing on all Grass Creek lands apart from Wilderness Study Areas is abhorrent, period.

For starters, the BLM needs to eliminate lease options near all areas of Critical Environmental Concern (ACEC's) with appropriate buffer zones. Further, exploration should be denied in the upper Owl Creek area foothills, highlands, and above timberline. Another real sore point is the waiving of No Surface Occupancy (NSO) stipulations in the past. Any NSO's should be inviolable once issued, and should be issued rather liberally with regard to other resources. There are simply some locations that should never have drilling rigs allowed under any circumstances. There is still plenty of leasing acreage left for the oil companies elsewhere in the Grass Creek resource area without creeping into the mountains, towards crucial wildlife winter range and other areas of high intrinsic value.

GRAZING AND RANGELANDS: The Grass Creek plan needs to be very sensitive about grazing along riparian zones, and the overall goal should be managment to improve range conditions which are presently degraded or unbalanced. Given the extreme difficulty of educating ranchers, the BLM should nevertheless attempt just that. The "old way" of tending herds and flocks won't work anymore. Cowboys and herders need to stay with their stock on a 24-hour basis 7 days a week and keep them moving at all times, working them to the best advantage of the land, and treating riparian areas like luxurious Beverly Hills restaurants instead of free-for-alls. Range conditions need to be improved in almost every area of the Grass Creek resource area that I have ever visited. One excellent tool for this goal is the steadfast use of a 50-year burn cycle on areas where vegetation communities have been altered due to past fire suppression. I would hope that the BLM could find a way to streamline the Environmental Assessment process and up-front paperwork intertia to allow range cons and ranchers to actively pursue effective controlled burns.

Ranchers need to go back to school on modern range management tools and long range planning, and BLM needs to get on a fast-track plan to see that paperwork becomes real work in earnest.

367.3

GRASS CREEK DEIS/ Page 3

Grazing and rangelands/ cont'd: I generally applaud [the BLM's] proposal in the DEIS to reduce grazing allotment levels to more realistic quotas that better reflect actual AUM useages. It is a step in the right direction towards reorienting the entire grazing program to fit tightly the carrying capacity of the lands. I would hope that the BLM has enough personnel and resource to actively monitor grazers and herds throughout the forage season to ensure compliance with dynamic goals. The thought had also occured to me that the local grazing advisory boards which have some degree of control and a great deal of input over decisions regarding range allotments should as a matter of policy include at least one member who is not from the grazing/ ranching community. I believe it is important that all resource users have direct management input in multiple use areas. Non-extractive resources and non-income producing resources should have active representation on advisory boards and thru the BLM hierarchy. Wildlife, recreation, and cultural resources deserve a role in discussions determining range allotments.

One last comment on grazing: Don't give into the temptation to adopt the Alan Savory "holistic" grazing approach wholeheartedly. Savory's techniques should be treated skeptically. The premise that you can place larger number of cattle on grazing tracts and rotate them thru a cycle which actually improves range carrying capacity and puts more weight on cows is one of those "too good to be true" offerings. If it didn't work in South Africa, what is he doing in America? The Savory "holistic" approach is largely smoke.

GENERAL COMMENTS: The Grass Creek resource area contains lands which are unique in many ways, and are largely unknown or unappreciated outside the immediate area. Spectacular geology and landforms with a good mix of historic and scenic values, plus the "openness" of the area are its greatest strength. I would sincerely hope that the BLM recognizes values other than dollars when weighing alternatives to managment actions. There is entirely too much political pressure being applied from local (county) and state (Governor's office) levels to develop any and all extractable resources, sooner rather than later. I strongly believe that wildlife, cultural, and non-dollar intrinsic values get compromised when corporations coming demanding oil and timber and mining leases and more AUM's for their barely-profitable grazing programs. As I have indicated, I believe oil & gas are better developed elsewhere than sensitive Owl Creek/Absaroka foothills regions; livestock constitute exotic alien species and should not be given so much "clout" in allocating limited resources; and rangeland "repair" in order to invest in the future makes more sense presently than high sustained yields of graze and a general degredation of the overall carrying capacity and alteration of vegetative communities away from natal original plant communities.

I cannot overstate the need to revisit criteria for fostering Big Horn sheep popultions, and working on the deer herds as well. Also, the day is not far off when Grizzlies will be found in the upper Owl Creeks and Absaroka front. Not one word in the DEIS about that very real contingency, yet there will be "bear problems" as soon as this year. And we need to get realistic about the place of the Mountain Lion in the ecosystem. Finally, I need to emphasize that greater consideration be given to setting aside more primitive/non-motorized areas.

Of the limited choices offered in the DEIS, your Alternative C most closely fits my concepts of the best management plan.

Thanks for the opportunity to have some input! Dewey

05/01/95 15:13 002

368

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

368.2

I object to the small consideration given to the economic impacts of businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences and prairie dog- black-footed ferret inferences

Richard E. [signature]

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

369

Linda Raynolds
[redacted]

May 5, 1995

Dear Mr. Ross,

I am writing to comment on the Gress Creek Resource Area Resource Management Plan Draft EIS.

My main concern with the document is that the entire Resource Area is to remain open for O&G leasing. I have had personal experience with the efficacy of NSOs and other stipulations on the North Fork of Owl Creek. As soon as an oil company wanted to drill a wildcat well in a particular spot, the NSO on the site was waived by BLM decree and the stipulations meant to protect the access route were largely ignored. Thus, although the current document appears to be protecting sensitive areas with restrictive language, I am now fully aware that all it takes is a stroke of the pen to remove these stipulations and allow unimpeded access to industrial development.

Likewise, where the EIS appears to be proposing seasonal restrictions on certain areas to protect wildlife habitat, the small print reads that these restrictions are for exploration only and would not apply to a production scenario.

What is this Federal mandate to open all public land to O&G leasing? I would sincerely appreciate a copy of such a document for my files. Please send it to me if you can. In any case, you state in the introduction to the EIS that "public lands would remain open and available for mineral exploitation and development, unless doing otherwise is clearly in the national interest." The EIS identifies several important sites within the resource area, including Wilderness Study Areas, ACECs and NNLs. If these areas are of sufficient merit to justify these special designations, then it seems clear to me that it is in the national interest to protect them from industrial development. I have learned that withdrawing lands from leasing is the only course of action that will actually accomplish this. And from the point of view of an oil company, this seems only fair. They pay good money for those leases, which ought to entitle them to access and the right to explore and develop. Removing the most sensitive lands from leasing would make the whole system much more straightforward. Even if all available land in the Resource Area is already leased to O&G, it hardly seems premature to set an objective to withdraw these sensitive areas as the current leases expire.

A common objection by industry to this type of action is that these lands will "forever" be "locked up" and closed to extraction, development, etc. The important point to remember is that closure, even something as concrete as wilderness designation, is by nature temporary. In a national crisis Congress can certainly revoke wilderness designation in favor of resource development. Right wing elements in society today are even proposing opening National Parks to extractive industries. Political climates change with the wind. What doesn't change so easily, especially here in the arid West, is

369.2

the face of a landscape that has been subjected to industrial development. Roads can be blocked off, but how many hundreds of years will it be, even if the land is recontoured, before the scars are no longer visible? It takes generations for trees to grow, riparian areas to heal, mineral pollutants to dissipate, erosion to stabilize. Protecting fragile lands is simply a common sense conservative approach. Let future generations make their own decisions, based on their own economic imperatives. Lets leave them some alternatives.

To summarize, I suggest that the WSAs, NNLs and ACECs , as designated in the preferred alternative, be withdrawn from any future oil and gas and mineral leasing. Barring that, I support the more extensive NSO designations recommended in Alternative C.

It was unclear to me what designation the BLM would ascribe to the WSAs in the event they failed to pass Congress. I think they should be protected by the most stringent restrictions available under the new plan, and in any event should be accorded roadless status.

I support the proposal to require paleontological surveys in areas of known or suspected fossil deposits. These are a national resource, and this part of Wyoming is world famous for its fossil beds.

I was concerned with how little protection was accorded the two petroglyph sites. These are Native American sacred sites, and the sacredness extends beyond the rock faces on which the petroglyphs are inscribed. The whole area is sacred. The surrounding land is sacred, the vistas are sacred, the vegetation, the water and the fauna are sacred. Of course there are existing roads, fences, gravel pits, oil wells, etc in near proximity to the sites. That can't be helped. But I think these holy spots deserve more than a quarter or half-mile buffer zone from future incursions. I hope you will make every effort to engage the Shoshone and the Crow people in any decision making process involving these and any other sacred areas. Again I take the conservative stance: protect it today so that there remains the possibility of more informed decisions in the future.

As far as land use and access, I generally support Alternative C. I think it is important to designate significant areas of ROW avoidance, as well as designating ROW corridors. I also think that as far as public access ROWs are concerned, greater emphasis should be placed on securing non-motorized accesses in preference to motorized ones. Private landowners have a lot more trouble with vehicles crossing their property than with riders or hikers.

Alternative C also had a better proposal for dealing with land exchanges than the Preferred Alternative. I don't believe that public land should be sold. I think it should only be exchanged for land of equal value. But Alternative C goes one step further and requires that there be no net loss of crucial wildlife habitat. I support this concept, though I would like to see more specific wording than "crucial wildlife habitat". I would include wetlands and exceptional scenic areas as types of land that should remain in the public domain.

Finally, I would like to make one additional general comment. I would like to see road-building and its impacts analyzed

369.3

separately in this type of planning document. Oil and gas and mineral exploration, public access logging, and other activities often result in road building or upgrading. Even if an attempt to reclaim the road is made, the visual scars and erosion and vegetation changes endure for decades. Often a request is submitted by landowners to retain the road. Usually once the thing is built it continues to be driven on. In a lot of the resource area all it takes is a few trips with a pickup and you have a two-track, resulting from soil compression and vegetation disturbance, that becomes an invitation for the next driver to follow the same route. Upgrading a two-track into a reasonably passable road brings more people to drive on it.

The chain of events is as follows: Stage 1- No road- pristine landscape, game and stock trails. Stage 2- A 4-wheel drive road leads up into the mountains, accessing cow camps and hunting camps, with unrestricted public access. Stage 3- An oil company decides to try a wildcat well on their BLM lease and upgrades the road. Stage 4- Landowners, enraged at the oil company, the BLM, and the increased public traffic on their road, put up a locked gate.Stage 5- The public can no longer access BLM and National Forest lands, is at loggerheads with the landowners, and the fight is on.

This is precisely what happened on both the South Fork and North Fork of Owl Creek, upper Cottonwood Creek, and in innumerable other places. Meanwhile the BLM has been unwilling to take responsibility for the pivotal role that it plays in so many of these scenarios. Road building is probably the single most destructive activity that takes place in the Resource Area. It compromises everything from scenic values, soils, watershed and wildlife habitat to human relations and traditional land use patterns. And yet nowhere in this EIS or any other that I have read is it given even a paragraph on its own.

Road-building and upgrading should be analyzed on both a case-by-case basis and cumulatively. The domino effect of increased human access should be evaluated and disclosed as part of the public process. The Resource Area should have goals in relation to roads on public lands. No net increase of roads might be a realistic objective. Different approaches to O&G exploration could be considered, such as allowing access to certain sites only during winter with a snowpack and frozen ground. The Unimat system, which was used on my property on the North Fork of Owl Creek, also has certain things to recommend it when it is taken up in a timely fashion. There are other access solutions besides building roads. They may seem expensive in the short term, but in the long term future generations will thank you for them.

I hope my comments will be of interest to you and help you in preparing the final EIS.

Sincerely,

370

BLM
Bob Ross, RMP Team Leader
P. O. Box 119
Worland, WY 82401-0119

RE: Grass Creek Management Plan

Gentlemen:

I appreciate the opportunity to contribute to this very important issue of Environmental Impact in the Grass Creek area.
It is generally agreed that safe-guards of the environment, land values, history and other aspects need to be considered and protected. However, I feel this is currently being done by the BLM through its Standard Lease Agreement Section 6, the State DEQ, and other agencies through normal rigorous permitting processes. Additional blanket restrictions, such as those proposed in the current draft, are harmful and unwarranted and unneeded. I must object to the apparent lack of consideration given to the impact these restrictions could have on the oil and gas, livestock and timber industries. These businesses contribute a great deal to the tax base of many cities, towns and counties in the NW corner of Wyoming. I would hope
[page 2]
the BLM would not want to be responsible for a loss of these industries.
I would recommend that a new preferred alternative be created with input from knowledgeable community members and representatives from livestock, grazing, oil and gas and minerals, timber and local and state governments.
Thank you for this opportunity to respond
Sincerely
/s/ Carl L. Bassett
xxxxxxxxxxxxx
xxxxxxxxxxxxxxxx

371

xxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxxxxxxxx
xxxxxxxxx
May 3, 1995

Worland BLM
Bob Ross, Team Leader
Box 119
Worland, WY 82401-0119

Dear Mr. Ross,

I am very concerned about the Draft Management Plan for the Grass Creek Resource Area of the Big Horn Basin. I think that the Plan should be completely rewritten. There are several reasons for this. Under the current Plan, there is little concern for the livelihood of a great many people. In additional, the reduction of the tax base of Washakie County, Park County, Big Horn County
[page 2]
and Hot Springs County would be severe. It doesn't seem fair to write off the 46,900 people who live in those counties.

But even if the people are not considered, the current Plan should be rewritten because as it stands now, the strength of the United States is being reduced. This country is great because of its resources and its people who are willing to sacrifice for the good of the country. By limiting access to the country's resources, we become ever more dependent on some one else to take care of us.

Please rewrite the Draft Management Plan for the Grass Creek Resource Area. The resources of this area may be needed, and the people of this area which to continue to make a living without unnecessary interference.

Sincerely,
/s/ Ruth Ann Gardner

372

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Bob Ross
BLM Team Leader
PO Box 119
Worland, WY 82401

Peter Leusch
PO Box 808
Driggs, ID 83422

I am writing about the Grass Creek Resource Area. I find your agency's plan for this area to be unacceptable. This area needs more protection at this crucial time. Your proposal to open WSAs Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw to minerals mining, motor vehicles, and other damaging or extractive industries is shortsighted and needs to be terminated NOW. These areas need to be managed to retain their wilderness character. Regardless of the whims of Congress, YOU need to protect these vital areas.

Furthermore, you need to designate more of Grass creek as Semi-Primitive, Non-motorized. Demand for these types of areas is on the rise and will continue to rise. Don't fall prey to industry and politicians cries for more land to exploit. The public needs wild, unroaded lands as much as the animals that live there do. We need to preserve as much of this great national heritage as we can. The people and the critters that follow depend on it.

I am in support of the wildlife prescriptions in Alternative C. I urge you to follow this alternative or one that gives more protection to the wildlife and wildlands in Grass Creek. The other Alternatives and the one that you recommend are a disaster. You are mandated to provide 'multiple use'. On reviewing your plans, one thing came to mind: 'multiple ABUSE'! Please change the course of this ill fated mission. The future of Grass Creek and all of Wyoming depends on you leadership.

Peter J Leusch

Dedicated to the wise use of Wyoming's Section 3 grazing lands

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

WYOMING STATE GRAZING BOARD
CENTRAL COMMITTEE
P.O. Box 1302 Lander, Wyoming 82520
(307) 332-2641

373

5/3/95

Mr. Bob Ross, Team Leader
Grass Creek RMP/Draft RIS
POB 119
Worland, Wyo. 82401

Dear Mr. Ross,

These comments are in addition to the comments I presented at the Hearing held in Worland last month on this document.

With respect to the information in the document on page 132 on acres of riparian habitat in "functioning condition", or not, my comment is that I can find no support outside of the BLM in the range science technical community for the checklist approach to determine whether or not a riparian area is "functioning" or not.

In addition, I have discussed this item with a number of Grass Creek permittees. Very few remember being asked by the Worland BLM to participate in the evaluation of this item in their allotment(s).

For these reasons, I ask that you withdraw the information in this RIS/RMP on riparian functioning condition until such time as the BLM agrees to use a technical method accepted by the consensus of the range science community.

With respect to the Table on page 133 on Desired Plant Communities. It is presently BLM policy to require documentation that a proposed desired plant community is, in fact, possible to achieve on a site prior to it being proposed for that site.

This RMP proposes a number of desired plant communities without providing any support documentation that they are technically possible to achieve. Please either withdraw the proposed desired plant communities in the RMP, or provide the support information in the Final RMP that the proposed desired plant communities are at least technically feasible.

Also, a number of permittees with whom I have discussed this issue do not recall having been consulted with prior to the publication of the Draft RMP on this subject. If they were not properly consulted on this matter, the proposed desired plant communities have been developed by the BLM in violation of the letter & spirit of the Public Rangelands Improvement Act of 1978.

373.2

The inventory on which the information on range condition is based is inadequate for this purpose. The data on which these assumptions of range condition are based is too old to be considered current for the Grass Creek Resource Area. This "data" should be removed from the Final RMP because it can not be confirmed that the conditions stated for each allotment are correct for the early 1990 period.

In addition, the early 1980 period SVIM procedure used on the Grass Creek R.A. only took actual field data on plant composition by weight from 20% of the sample areas identified in the pre-planning stage of the inventory. It is inappropriate to try and extrapolate plant composition data into the other 80% of the sample sites for the purposes of estimating range condition in this Area. For these reasons, all references to range condition should be removed from the Final RMP.

The information on "suitability" was developed by BLM staff as an office procedure in the early 1980's period. The information in this Draft RMP has no support from the range science community, is based on an invalid technology, and should be withdrawn from the Final RMP.

With respect to the utilization standards in this Draft RMP, I can find no support in the published literature to confirm that management of rangelands under these standards will accomplish any of the stated land management objectives. They should be withdrawn in the Final RMP and replaced with objectives based on a state of the art technology accepted by the profession.

A number of the definitions provided in the GLOSSARY do not confirm with the definitions published by the Society For Range Management. Please remove, and/or change, those definitions that are not consistent with the SRM publication on this subject. Attached is a copy of the cover of the most current SRM publication for your information and reference should you wish to obtain a copy from the Society.

Thank you for considering these additional comments.

Dick Loper

Dick Loper, Consultant to WSGB

encls: 1
cc: WSGB

373.3

A Glossary of Terms Used in Range Management

Third Edition
Compiled and Edited by

Glossary Revision Special Committee, Publications Committee
Society for Range Management

Peter W. Jacoby, Chairman

Published by
Society for Range Management
1839 York Street
Denver, Colorado 80206

374

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

William J. Barmore, Jr.
[redacted]

May 5, 1995

Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

Thank you for sending me a copy of the *Grass Creek Resource Area Resource Management Plan and Draft Environmental Impact Statement* (DPEIS). I wrote the following page specific comments, suggestions, and recommendations as I progressively worked my way through the document, thus some duplication probably occurs, for which I apologize. In addition, in the interest of brevity (?) I have not commented on those extensive portions of the DPEIS which are well done and with which I agree, but rather I concentrate on what I believe to be shortcomings in the document, on analyses, interpretations, and management recommendations with which I disagree, and on suggesting changes in the preferred alternative that I believe would better provide for the public interest over the long term. Clearly, the BLM staff has applied a lot of professional knowledge and talent in preparing the document. A wealth of important information is clearly presented.

GENERAL COMMENTS AND MAJOR RECOMMENDATIONS

A. I believe the preferred alternative should be modified, as I describe in my page specific comments below, to include more aspects of Alternative C, and some features that are not included in any of the alternatives.

B. The wilderness and roadless character of the wilderness study areas should be retained whether or not Congress decides to add these areas to the National Wilderness Preservation System. It is imperative that these areas be closed to oil and gas leasing and mineral entry.

C. Proposed National Natural Landmarks should be closed to oil and gas leasing and mineral entry and motorized travel should be restricted to

374.2

designated roads (no travel on trails).

D. The plan should include more explicit goals and a more aggressive program for achieving desired plant community objectives and acceptable ecological condition classes where degradation is attributable to past or current livestock grazing, especially for riparian lands.

E. The plan should include stronger provisions for protecting and enhancing the bighorn sheep population and its current and potential range from conflicts with livestock, particularly domestic sheep.

F. Travel by motorized vehicles other than on designated roads and trails should be prohibited except for the proposed play area near Worland.

G. The proposed Areas of Critical Environmental Concern should be withdrawn from oil and gas leasing and from applicability of the General Mining Laws.

H. The ecological significance and maintenance of adequate old growth forest should receive greater emphasis than is provided in the DPEIS and the preferred alternative.

I. Better documentation to support statements of policy, regulations, interpretations, and conclusions, study results, etc. should be included in the *Grass Creek Resource Area Resource Management Plan and Final Environmental Impact Statement* (FPEIS) along with full citations in the References section.

PAGE SPECIFIC COMMENTS AND RECOMMENDATIONS FOR MODIFICATION OF THE PREFERRED ALTERNATIVE

1. Page 9, Withdrawals and classifications---The (FPEIS) which is finally adopted should refer readers to Map 9 and Appendix 2 for more detailed information on which lands are currently withdrawn or classified and why they were so withdrawn or classified. The FPEIS should more clearly indicate the justification for terminating the withdrawals and classifications. These lands should not be opened up to operation of the General Mining Laws until the these archaic laws are revised. That such revision is anticipated is acknowledged elsewhere in the DPEIS.

2. Page 14, Elimination of Gas and Oil Leasing---It is indeed unfortunate that nearly the entire resource area is currently covered by federal gas and oil

374.3

leases and that the terms for all these leases apparently will extend through the year 2005. Is this true? Clarify. If so, this reflects poor land use decisions and commitment of other resources and values. The situation seems to preclude withdrawing key areas (which I describe in my page specific comments) from oil and gas leasing when current leases expire. Every effort should be made to eliminate leases in these key areas by negotiation with the lessees, by exchanging such leases for leases in less sensitive areas, or perhaps in some exceptionally critical cases, by buying out leases. I believe that closing some of the key areas to mineral exploration and development can certainly be demonstrated to be in the national interest. The specific BLM policies that require opening all public lands for mineral exploration and development except for Congressional withdrawals should be quoted and referenced here or in Appendix 4. Appendix 4 should include a list of existing leases, initiation dates, expiration dates, and other pertinent information to support the statement that nearly all of the resource area will remain under lease until after the year 2005.

3. Page 19, Cultural, Paleontological, and Natural History Resources Management, item 2---Either here or under the Natural History section on pages 107-108 and in Table 16, or on page 189, the management activities that will ensure the maintenance or enhancement of the special values of the proposed National Natural Landmarks should be described. This should include withdrawal of these areas from oil and gas leasing and applicability of the general mining laws and closure to motorized travel except on designated roads (no travel on trails).

4. Page 24, Forestland Management, Management Objective---Apparently there are only 14,000 acres of BLM-administered forestland capable of sustaining forest production in the Grass Creek Resource Area. Some of this acreage occurs in the Owl Creek Wilderness Study Areas which are contiguous with designated wilderness in the Shoshone National Forest. In addition, the acreage of forestland south of Cottonwood Creek is contiguous with larger areas of forestland in the Shoshone National Forest (Management Area 3A) that are to be managed with emphasis on semiprimitive nonmotorized recreation. Management of forestland on BLM lands south of Cottonwood Creek also should emphasize semiprimitive nonmotorized recreation and noncommodity resources, as proposed in Alternative C. Management of BLM forestland north of Cottonwood Creek should be compatible with management of the contiguous USFS land. Basically, wildlife, recreation, maintenance of high visual quality, and minimal roading should be emphasized over timber

harvest in all BLM forestland.

5. Page 25, Forestland Management, last item on the page---15 years is too long to wait for clearcuts to be regenerated by natural or artificial means. Cutover areas should be regenerated within 5-7 years, as is required on the adjacent Shoshone National Forest.

6. Page 26, Forestland Management, first item on the page----Fencing aspen stands to preserve them from excessive browsing by ungulate and livestock cannot be justified ecologically, and especially for economic reasons. Natural or prescribed fire, used extensively, along with acceptable levels of browsing and grazing by wild and domestic ungulates is the only practical program for maintaining and increasing aspen stands.

7. Page 29, Lands and Realty Management, Access, Management Actions---Emphasis should be on attaining public use easements on existing roads that are closed to public use where the roads cross private land. It appears to me that, if such access across private lands is attained, there is no need to construct more roads in the Grass Creek Resource Area to improve public access.

   What is the need for improved public access in the upper Grass Creek area? Is this a matter of obtaining access across private lands or constructing new roads? Clarify.

8. Page 30, Lands and Realty Management, Access, item 3----What is meant by "limited motorized vehicle access"? Access across private lands? Clarify.

9. Page 30, Lands and Realty management, Access----Again, does this refer to pursuing public access easements on existing roads across private lands? Clarify. Will improving access lead to more vandalism in the area?

10. Page 32, Lands and Realty Management, Land Ownership Adjustments, item 1---The criteria in Appendix 2 should specifically state that the environmental analyses required for proposed land adjustments will include public involvement or other interested parties.

11. Page 32, Lands and Realty Management, Land Ownership Adjustments, item 2---The FPEIS should explain why these lands should be considered for deposition by means other than purchase by the BLM.

12. Page 32, Lands and Realty Management, Land Ownership Adjustments, item 3---This should clarify that the exchanges would be for the purpose of acquiring private lands in these areas.

13. Page 33, Rights-of-Way, item 1---The FPEIS should be specific about the conflicts and sensitive areas referred to.

14. Page 33, Rights-of-Way, item 2---It is unclear from Map 7 as to whether or not the two right-of-way corridors would be in addition to or in place of the right-of-way concentration areas. What is the difference between right-of-way corridors and right-of way concentration areas? These are not defined in the glossary.

15. Page 34, Rights-of-Way, items 1 and 3---The preferred alternative does not adequately provide for protecting scenic values along these travel routes. Alternative A and C should be followed, including the Right-of-way avoidance areas shown for Alternative C (Map 8).

16. Page 35, Withdrawals, item 1---These withdrawn lands should not be returned to operation of the General Mining Laws until these archaic laws are revised.

17. Page 35, Withdrawals, item 4---The proposed mineral withdrawals are appropriate and should be retained in the FPEIS.

18. Page 35, Livestock Grazing Management---Since 53% of the allotments are in the "Improve" category where "The objective is to improve resource conditions and productivity to enhance overall multiple use opportunities." (Appendix 3), the EIS and the alternative that is ultimately implemented should more explicitly include measures for expeditiously improving unsatisfactory conditions attributable to livestock grazing on allotments in the Improvement category. The preferred alternative is too vague in this regard.

19. Page 40, Livestock Grazing Management, item 1---None of the forage in occupied or potential bighorn sheep range should be allocated to domestic livestock, especially on bighorn sheep winter range. Bighorn sheep habitat should be closed to domestic livestock grazing.

20. Page 40, Livestock Grazing Management, item 2---There should be no use of occupied or historic bighorn sheep habitat by domestic sheep due to the scientifically documented conflicts (disease and forage competition)

between bighorn sheep and domestic sheep. Removal of domestic sheep from these areas should be accomplished immediately. There is no way that mitigation---except complete separation of the two species---is relevant to this situation. The buffer zone of 2 miles is insufficient to safely eliminate the risk to bighorn sheep. What does "Domestic sheep grazing would be restricted. . . ." (my emphasis) mean? No such grazing? Clarify.

21. Page 40, Livestock Grazing Management, items 3, 4, and 5---Combined utilization of key grasses should be limited on all elk winter range and crucial winter range. All grass utilization should be allocated to elk on crucial elk winter range. Where domestic livestock grazing is to be allowed on elk winter range other than crucial winter range, a high proportion, probably 75% of the limited grazing utilization should be allocated for elk use during winter. The EIS should more explicitly indicate what proportions of the limited combined utilization will be allocated to elk and to livestock. Apparently 195,000 acres are considered to be winter and crucial winter range for elk. Elk should have high priority over livestock on all elk winter range.

22. Page 41, Livestock Grazing Management, item 1---Again, what does "restricted" mean? Clarify.

23. Page 41, Livestock Grazing Management, item 2---All woody forage in the apparently very limited acreage of moose winter range should be allocated to moose.

24. Page 41, Livestock Grazing Management, item 4---Be explicit about the meaning of "restricted" domestic sheep grazing. Apparently 490,000 acres are considered to be winter and crucial winter range for antelope. Does the 121,000 acres represent all the crucial antelope winter range?

25. Page 41, Livestock Grazing Management, item 5---Again, be explicit about the meaning of "restricted."

26. Page 42, Minerals Management---The proposal to open all public lands in the resource management area to leasing for oil, gas, geothermal, and other leasable minerals is irresponsible and unacceptable. All the wilderness study areas should be withdrawn from leasing, the General Mining Laws, exploitation of salable minerals, and geophysical exploration until Congress decides whether or not to add these areas to the National Wilderness Preservation System. Even if Congress does not do so, these unique areas should be retained in a roadless state and managed to retain their wilderness

character.

27. Page 44, Minerals Management, Gas and Oil, item 2---The controlled-surface use stipulations should be described in detail in the text or in the Glossary. With regards to the no surface occupancy, controlled-surface use and timing stipulations, the FPEIS should summarize the history of the extent that these stipulations have been included in leases and the extent, if any, that such stipulations have been waived when exploration or development occurred and the reasons for any waivers. At least on U. S. Forest Service lands stipulations seem to waived all too easily and frequently. How would controlled-surface use and timing restrictions be implemented once gas or oil development occurs as regards the maintenance and service requirements of developed wells? Clarify.

28. Page 47, Off-Road Vehicle Management, item 3---These areas should be identified as wilderness study areas in this table and, as is apparently the case under current management (Alternative A) should remain closed to motorized vehicle use even if Congress does not add these areas to the National Wilderness Preservation System.

29. Page 47, items 4-6 and Page 48, item 1, Off-Road Vehicle Management---The proposal to limit vehicle use to designated roads and trails, except for the "play area" near Worland is commendable. Random off-road and off-trail use of motorized vehicles is unacceptable due to adverse impacts on natural resources. However, the FPEIS should more explicitly indicate in text and maps the extent of the existing and planned trail system and the extent that roads and trails would be open to motorized vehicle use. It is imperative that sufficient areas in appropriate environments, in addition to the wilderness study areas, be designated for non-motorized recreation use. This is particularly important in the foothills and peaks of the Absaroka Range. The majority of trails in the Absaroka Foothills should be closed to motorized vehicle use.

30. Page 49, Off-Road Vehicle Management, item 2---Restriction of over-the-snow vehicles to designated roads and trails until activity planning addresses their use is appropriate. In developing such plans consideration should be given to designating one or more areas accessible by plowed roads for non-motorized over-the-snow travel (skis, snowshoes).

31. Page 49, Recreation Management, Management Objectives---There appears to be a contradiction here. The Glossary states that "primitive" recreational opportunities do not exist in the resource area (also see page

374.8

120). Such opportunities, by definition, should exist in the wilderness study areas, and should be retained there even if Congress does not include these areas in the National Wilderness Preservation System. The FPEIS should explain why the wilderness study areas are not considered to provide primitive recreational opportunities. I endorse the idea of managing more of the resource area for primitive recreational use. But here again, does "primitive," really mean "semi-primitive non-motorized" and "semi-primitive motorized"? I assume that it does, but this should be clarified in the FEIS.

32. Page 49, Recreation Management, Management Actions, item 1 ---The FPEIS should describe the management and use of SRMAs and ERMAs and the differences between the two kinds of areas.

33. Page 51, Recreation Management, item 3 ---The general location of this road should be mapped in the FPEIS. If such a scenic road is developed, it should not detract from retaining the wilderness character and the quality of a primitive recreational experience in the wilderness study areas, whether or not Congress adds these areas to the National Wilderness Preservation System.

34. Page 51, Recreation Management, item 5 ---The locations of the Wardel and Harrington reservoirs should be shown on the maps.

35. Page 52, Recreation Management, item 1 ---Again, trails should be shown on a map. The action implies that the trails served by these trailheads would be closed to motorized vehicles. This should be clarified in the FPEIS. Again, the FPEIS should map designated trails that are to be open to motorized vehicles. In developing trail head facilities, particularly the size of parking areas, consideration should be given to the levels of use that are desired for the environments served by the facilities.

36. Page 52, Recreation Management, item 2 ---See comment 35. Again, does "primitive" really mean "semi-primitive? Clarify.

37. Page 57, Vegetation Management, DPC Objectives for Forestlands ---Development of old growth forest requires long time periods, but natural or man-caused fire can wipe out extensive areas of old growth forest in a short time. Thus, to ensure an appropriate representation of old growth forest over the long term, a much higher proportion of the forestlands in the resource area should be maintained in old growth, both for ecological and esthetic reasons.

374.9

38. Page 62, Visual Resource Management, item 6 ---The stronger restrictions under Alternatives A and C should be included in the final alternative that is implemented. It is imperative that the visual quality of these corridors be maintained and, where possible, enhanced.

39. Page 66, Wild Horse Management ---I do not believe that maintaining a wild horse herd is can be justified in terms of either the impacts on natural resources or the management costs involved. At a minimum the wilderness study area currently included in the herd area should be excluded from any herd area that is ultimately established.

40. Page 69, Wild Horse Management, item 1 ---Additional water sources should not be developed in the wilderness study area regardless of whether or not Congress includes the area in the National Wilderness Preservation System. Wild horses should be excluded from the study area.

41. Page 69, Wild Horse management, item 2 ---Any such development of enhanced opportunities for the public to view wild horses, especially road construction, should not occur within wilderness study areas or detract from maintaining their wilderness character, regardless of whether Congress includes the areas within the National Wilderness Preservation System.

42. Page 72, Wildlife and Fish Habitat Management, Wildlife Habitat, item 3 ---Since the public lands belong to the national public, the FPEIS should indicate that "affected public land users" includes the general public or other interested parties, not just commodity users in the resource area.

43. Page 74, Wildlife and Fish Habitat management, Fish Habitat, items 1 and 2 ---Establishing minimum pools for reservoirs should be a high priority for the agencies involved.

44. Pages 74-77, Special Management Areas ---The establishment of the 3 Areas of Critical Environment Concern is commendable, but the management of these areas should be strengthened by withdrawing them from oil and gas leasing and development and from applicability of the General Mining Laws. The provision for no-surface occupancy of the Upper Owl Creek Area does not provide sufficient protection given the susceptibility of such restrictions to being waived.

45. Page 111, Livestock Grazing ---Either here or in Appendix 3 details

374.10

related to the development, implementation, and administration of allotments and allotment management plans should be provided (e.g., number of years for which a plan and grazing permit is valid, provisions for revising allotment management plans, how often such plans should be updated, etc.).

46. Page 120, Recreational Opportunities, Semiprimitive Motorized and Roaded Natural ---These sections should more explicitly indicate how much of the acreage is currently restricted to travel on designated roads and trails and how much is open to random use off of designated roads and trails. Or a separate section should indicate how much of the resource area is currently open to random, off-road and off-trail motorized vehicles.

47. Page 126, Table 8, Livestock Grazing ---The duration of soil loss due to grazing is stated as being temporary. Footnote 2 indicates that temporary impacts last for fewer than 5 years. Does this mean that all accelerated erosion due to grazing will be eliminated in 5 years? Or that accelerated erosion for any given spot is only temporary? Does it mean that the 53% of the allotments in the Improvement category (where, I assume, some accelerated erosion occurs) will be improved within 5 years so that such erosion does not occur? Clarify.

48. Page 131, Woodlands ---The causes for the encroachment of woodlands on to nonwoodland vegetation types and the relative contributions of the causes should be discussed. Due to climatic changes? Overgrazing? Fire suppression?

49. Page 132, Factors Affecting Forestland Condition, General Factors ---With an ecosystem approach to managing the forestland, which should include maintaining part of the forestland as old growth (where stagnation, insect disease, and old age are inherent), "production up to capability" should not be the overriding management goal. The FPEIS should acknowledge this.

50. Page 135, Vegetation Inventory and Ecological Range Condition and Table 12 ---The FPEIS should indicate and discuss the desired and ecologically acceptable proportions of the 4 ecological condition classes for each plant community range site. What would good ecosystem management call for? It is not enough to just list the current proportions in the various ecological condition classes. And what is the relationship between the current proportions and the impacts of livestock grazing and to the 53 % of the grazing allotments that are in the Improve category?

374.11

The column subtotals on the 1st and 2nd pages of Table 12 are misaligned.

51. Page 139, Wild Horses, 5th paragraph ---The wild horses as well as the domestic sheep grazing should be managed to achieve desired range conditions and to reverse downward trends that can be attributed to grazing. Also the first part of comment 50 also applies here.

52. Page 142, Bighorn Sheep ---Here or elsewhere in the affected environment section, the current situation regarding the proximity of domestic sheep grazing to current, historic, or potential bighorn sheep range should be discussed. My cursory examination of grazing allotments in Table 3-3 and Map B indicate that all allotments within several miles of bighorn sheep winter range (as shown on Map 31) are for cattle. This is as it should be and should be pointed out in the FPEIS.

53. Pages 151-152, Proposed Areas of Critical Environmental Concern ---The purposes for establishing these areas and the management actions that will be taken to accomplish the purposes should be described. This should include withdrawing them from oil and gas leasing and development and from applicability of the General Mining Laws.

54. Page 152, Proposed Areas of Environmental Concern, Upper Owl Creek Area ---The management objectives for this area should be stated.

55. Pages 189-190, Livestock Grazing and Table 17 ---The FPEIS should describe the degrees that the alternatives would correct undesirable vegetation and watershed conditions that are attributable to livestock grazing and management practices. The alternative that is finally implemented should be designed--and the reductions in livestock AUMs should ensure--that such undesirable conditions are corrected or are at least set on an improving trend.

56. Page 192, Leasable Minerals, 5th paragraph ---The FPEIS should discuss the reasons for the current closure of the coal and phosphate classifications and the justification for re-opening them under the preferred alternative. This could be partially accomplished by referring to Table 2-1.

57. Pages 195, Forestland Vegetation, last paragraph ---The statement "Before the planning area was settled, the forestlands maintained an open understory of grasses and scattered shrubs because of frequent low intensity fires" is too general and inclusive and if retained in the FPEIS should include supporting documentation. The statement is probably too broad

and inclusive. Forestlands at higher elevations and on northern exposures would have most likely been dense old growth spruce-fir and mixed conifer forests that may have been returned to an early successional state in patches of varying size by very infrequent (several hundred year intervals) stand-destroying fires. But the unburned old growth stands then would have been similar to old growth stands now----dense stands of large trees: moderate to dense undergrowth of trees, shrubs and herbaceous vegetation, generally high moisture in the vegetation and soils; abundant woody material in various stages of decay in the overstory and on the ground, etc. The extensive current acreage of spruce-fir and mixed conifer forestlands cannot by a long shot be attributed to 100 years of fire exclusion.

58. Page 196, Forestland Vegetation---The FPEIS should define and describe "mature", "overmature", and "old growth" forestlands. I believe the DPEIS incorrectly downgrades the ecological significance of old growth forest and is incorrect in stating that wildlife habitat and biological diversity would decline over the planning period due to the remaining high acreage of older mature and old growth forests. If this interpretation is retained in the FPEIS, it should be documented. While an individual old growth stands may have lower biological diversity than some individual younger forest stands (this conclusion should be documented), old growth forest contributes its own set of plant and animal species to the cumulative biological diversity of the forestlands and, thus, to the cumulative biological diversity of the resource area. The DPEIS gives too much emphasis to managing forestlands for maximum production of wood products.

59. Page 196, Rangeland Vegetation, 3rd paragraph----It is appropriate to recognize prescribed fire as the preferred method of sagebrush control. But reference to prescribed fire should more specifically refer to prescribed natural fire and prescribed management-induced fire, and these terms should be defined in the text or Glossary. I suspect that fire would be effective in controlling the extent that juniper invades non-woodland vegetation if grass-forb fine fuels had not been reduced by past or current heavy grazing by livestock.

60. Page 196, Rangeland Vegetation, last 2 paragraphs----The FPEIS should give the acreage for the 75 allotments that were in static condition in 1990. The FPEIS should also compare the number of allotments and acreages in the various ecological condition classes in 1990 with the anticipated acreages in 2005.

61. Page 197, Riparian Function and Table 21----Due to the extremely limited occurrence of riparian lands and their disproportionate contribution and importance to biological diversity, wildlife, and recreational activities, greater emphasis than is provided under the preferred alternative should be put on advancing the areas in a downward trend and the areas in the non-functioning condition to the properly functioning or functioning-at-risk with an upward trend condition classes, as is provided for in Alternative C.

62. Page 198, Wildlife habitat, 2nd paragraph---Coniferous forest that provides effective hiding cover for big game, especially elk, is extremely important to maintaining the size and distribution of herd segments. Loss of 1,900 acres of hiding cover due to timber harvest seems excessive, particularly considering the low acreage of coniferous forest in the resource area and the likelihood of increased human activity, particularly during the hunting season, resulting from the planned improvement in road access or from the forecasted increased recreational use with or without improved road access.

63. Page 199, Wildlife Habitat, left column, 7th paragraph---Due to the potential adverse impact of domestic sheep on bighorn sheep (disease transmission and competition for limited forage, particularly on bighorn sheep winter range), the buffer zone should be greater than 2 miles. and this seems to currently be the case based on the Information in Table 3-3, Map B, and Map 3 indicate that this may currently be the case. This paragraph could also mention that keeping domestic sheep grazing well away from bighorn sheep range, particularly winter range, would also preclude competition between the two species for forage. All forage on bighorn sheep range, especially their winter range should be allocated to bighorn sheep and other big game species, such as elk which often utilize bighorn sheep winter range.

64. Page 199, Wildlife and Fish, right column, 2nd and 3rd paragraphs---There seems to be a contradiction here. The 2nd paragraph states that controlled surface-use restrictions would allow the application of seasonal limitations on new gas and oil production on critical winter ranges and birthing habitat for elk, moose, and bighorn sheep. But the 3rd paragraph states that seasonal restrictions would not be applied to new production. Why the difference? How can such restrictions be effectively applied to producing gas and oil wells and fields in light of their maintenance and service needs? Clarify.

65. Page 200, Table 22---The emphasis in the Preferred Alternative to

improve the status of bighorn sheep winter range is commendable and should be increased if ecologically and economically feasible,including reintroduction of bighorn sheep into historic or potential range that is currently unoccupied.

66. Page 202, Preferred Alternative Summary---Council on Environmental Quality Regulations (§ 1502.16) require discussions of (1) adverse environmental effects which cannot be avoided, (2) the relationship between short-term uses of man's environment and the maintenance of long-term productivity, and (3) of any irreversible or irretrievable commitment of resources which would be involved. The DPEIS lacks these required discussions. Why?

67. Page 215, Wildlife Habitat, left column, 5th paragraph---This paragraph seems to imply that potential bighorn sheep range extends far beyond the currently occupied range. Appropriate management of bighorn sheep and their habitat will hopefully result in the expansion of bighorn sheep into the currently unoccupied but potential habitat. Thus, an adequate buffer zone between bighorn sheep and domestic sheep (which should be greater than the proposed 2 miles) should, at a minimum, be a moving zone that always extends well beyond any progressive expansion of bighorn sheep into their potential habitat. The buffer zone should not be a static one relative to the current distribution of bighorn sheep. Ideally, the buffer zone would be established beyond the limits of the potential bighorn sheep range. The nature and extent of the buffer zone relative to these points should be discussed in the FPEIS. Regardless, complete separation of the two species must be ensured.

68. Page 215, Alternative C Summary, 2nd paragraph----Again, this interpretation of the ecological significance of old growth forest to the biological diversity of the resource area seems flawed. Here or elsewhere this point requires more discussion and documentation from the scientific literature.

69. Page 230, Possible Landownership Adjustments, Review Process----This should explicitly provide for public involvement in the review process.

70. Pages 231-271, Appendix 3, Livestock Grazing Management---Somewhere in an existing or new table of all the grazing allotments, more complete information should be provided on which allotments operate under an allotment management plan, when the plans were developed and implemented, if they have been revised,and when they have been or should

be updated, etc.

71. Page 235, Components of the Livestock Grazing Management Program, item 2---The term "affected interest" should be defined and should provide for the involvement of the public at large not just publics with a vested economic interest in the program. This could be clarified by using the term "affected and interested parties," as is done on page 259.

72. Page 255, Utilization, right column, 3rd paragraph----Specific references should be given to support the statement that the indicated levels of utilization are appropriate for the precipitation zones and vegetation types and to support the statement that several studies indicate underuse in wet years will compensate for overuse in dry years.

73. Page 262, Table 3-8----the acronym CRMP should be defined in the list of abbreviations on page 3.

All but the first page of Table 3-8 is misabeled Table 8.

I appreciate the opportunity to comment on the DPEIS. Please send me a copy of the FPEIS and the record of decision when they become available.

Sincerely yours,

William J. Barmore, Jr.

William J. Barmore, Jr.

375

May 3, 1995

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIGHORN, WYOMING

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area BMP. Return all Wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

i object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

375.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Harvey J. Byler
Allen J. Byler
Ada J. Byler
Anna J. Byler
Marsha Byler
Leah J. Byler
Mary Ann Byler
Elizabeth Byler
David J. Byler

376

May 3, 1995

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIGHORN, WYOMING

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area BMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

376.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

David E. Miller
Betty B. Miller

377

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

377.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Erwin S. Lee
Esther B. Lee
Martha U. Byler

378

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

378.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Mary C Lee

379

May 3, 1995

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

BLM Zbob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

379.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Simon S Lee

Simon D Lee
Mary L Lee

380

May 3, 1995

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

BLM Zbob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

380.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Marvin Miller

381

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

381.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

[signature] - Mary E. Miller

382

MAY - 8 1995
BUREAU OF LAND MANAGEMENT

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

382.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Margie V. [signature]

383

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

383.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Carl E. Bohlen Jr.

384

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

384.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Mildred V. Hahn

385

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM Ken Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

385.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog/black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Carlton E. Blake Sr.

386

RECEIVED
MAY 3 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM Ken Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

386.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog/black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Hazel L. Ringdorfer

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

387

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

387.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Herman L Burghardt

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

388

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

388.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

James J Calhoun

389

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object in the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area BMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

389.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of Businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Barbara J. Cubbon

390

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 3, 1995

BLM Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object in the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area BMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

390.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of Businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

John Cubbon

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

391

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

391.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Rebecca Wojtowicz

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

392

May 3, 1995

BLM %Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timer and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUM's proposed in the Alternatives. Real, Current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

392.2

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog-black footed ferret inferences.

I believe in the multiple use concept, in that this is public land it should be used for all the public not just a chosen few. Public land should be used not only for recreation, but for grazing, harvesting of timber, extraction of minerals as well.

I believe most of the land should be sold into the private sector and put on the tax rolls. If not this then put the control to the state level where local people have a say instead of the "Great White Father" in Washington who doesn't understand local problems.

Judy Wojtowicz

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

393

American Wildlands
40 East Main Street, Suite 2, Bozeman, MT 59715
(406) 586-8175, FAX (406) 586-0943

Bob Ross
BLM Team Leader
P.O.Box 119
Worland, Wyoming 82401-0119

May 5, 1995

Dear Mr. Ross,

Thank you for the opportunity to comment on the Grass Creek Management Plan. American Wildlands (AWL) sees portions of the Analysis Area as important components of the functioning greater ecosystem of the northern Rockies. In these times of extreme political pressure we are encouraged by some of the proposals within your plan including: the continued protection for the Owl Creek, Sheep Mountain, Red Butte and Bobcat Draw Badlands Wilderness Study Areas, the recognition of valid needs for non-motorized semi-primitive recreation areas, the proposal for three Areas of Critical Environmental Concern (ACEC) and the withdrawal of public lands along the Bighorn River, the Legend Rock Petroglyph Site, parts of the Meeteetse Draw Rock Art ACEC and the Upper Owl Creek ACEC from mineral development. We urge you to go further in protecting such resources as the South Fork of Owl Creek, all riparian lands, critical habitat for plants, fish and wildlife, roadless and primitive country, grazing lands, candidate National Natural Landmarks, additional ACECs and opportunities for genuine "multiple use".

American Wildlands believes that Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands should be managed to retain their wilderness character. We think that the heavy emphasis within the proposed management plan on provision of motorized recreation is unacceptable. Opportunities for recreation in unroaded and primitive settings within the resource area are severely limited already. Unique and valuable scenic resources and candidate and potential National Natural Landmarks should be granted protection under visual management classification of "VRM II."

We support the proposal to establish the Fifteenmile Creek, Meeteetse Draw and Upper Owl ACECs but we think they should also be withdrawn from potential leasing for oil and gas and minerals development. The extraordinary value of the natural and recreational resources of the Fifteenmile Creek Watershed Area should be recognized and protected. We think that the South Fork of Owl Creek does in actuality meet the criteria for classification as a Wild and Scenic River and that it should be protected from oil and gas and minerals development and road construction.

Recycled Paper

393.2

AWL supports the proposal to remove lands along the Bighorn River, the proposed Owl Creek ACEC, parts of the proposed Meeteetse Draw Rock Art ACEC and the Legend Rock Petroglyph Site from mineral entry. Please consider extending the proposed withdrawal to the four Wilderness Study Areas in this resource area.

Thank you for the opportunity to comment on this important management proposal.

Sincerely,

Robert Hitchcock

Robert Hitchcock
Resource Specialist

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

394

May 4, 1995

Sherman T. Mast
215 W. 8th
Casper, WY 82601

Mr. Bob Ross
RMP Team Leader
P.O. Box 119
101 S. 23rd St.
Worland, Wyoming 82401-0119

Dear Mr. Ross:

Over a period of several weeks, I had an opportunity to examine the draft Grass Creek Resource Area Management Plan in considerable detail. Indeed, outside the BLM, I probably know as much about this document as anyone. I am also familiar with the country. I have tramped across public lands in the Bighorn Basin for the better part of 30 years.

First, allow me to make a few comments about the process. I know many people who adhere, in one hue or another, to the so-called "wise use" philosophy in your area and throughout the state. Many are good, well-meaning souls who want to improve relations between users of public lands and the agency personnel who manage them. Some ranchers in particular are real conservationists.

A few disciples, however, are merely blow-hards looking to pick a fight, or to line their pockets. Worse, they are ignorant blow-hards who don't like anything sharp, like facts, pricking their dull impulses.

The BLM has no responsibility to make decisions simply to placate a gaggle of this ilk. I think you know the difference, and I trust you

394.2

will keep the distinction in mind as the planning process goes forward.

Moreover, keep in mind that I own the same 1/260,000,000th interest in the Grass Creek Resource Area as any rancher, miner, hunter, or hiker in Worland, Greybull, or any citizen of Newark, N.J., or Honolulu, Hawaii. I spend much of my time on public lands, sometimes with a 4x5 field camera on my shoulder. Camera or not, the simple delight of such places is reward enough. That's my "custom and culture." It's called public access, now and in perpetuity.

Deal with facts and science, not supposition and hysteria. Do what is right by the resource, because the resource will outlast us all. Your principal responsibility is to protect it for future generations.

On the plan's details, I would offer the following comments:

First, I do not think the fate of the state's oil and gas industry hinges on a single strip of land approximately 2.5 miles by 10 miles in size. Withdraw the Upper Owl Creek area from leasing consideration entirely. If Upper Owl Creek is worth protecting, then protect it. Don't simply make a show. Don't leave the door open for future drilling exemptions.

It is not holy writ that oil and gas activity shall be pre-eminent, at all times and under all circumstances. Some objections have even been raised to timing stipulations, as if allowing antelope an opportunity to give birth infringes upon a "right" to drill public land at will.

Of course, this is nonsense. If multiple use means anything, then oil and gas must be regulated in a manner that is consistent with other values. Timing stipulations, and even outright prohibitions in some cases, are no more than predictable consequences of true multiple use management.

Many people are amazed to learn there are wild horses northwest of Worland. But knowing they exist doesn't make them any easier to find. A good dirt road to at least a portion of the range would help. And more visibility means a larger constituency, as experience on the Pryor Mountain Range suggests.

In terms of economic impacts, there may be a few AUMs lost to cattle or sheep if the horse herd management area is formally

394.3

enlarged. But any economic loss would be minuscule compared to potential economic benefits.

Outings organized by the BLM, or by volunteers, could help slow the tourist swarms to and from Yellowstone. Properly promoted, many people would surely spend an extra day in the basin if they had a reasonable hope of seeing some REAL wild horses. How many tourists are likely to stop with assurances of seeing REAL cows?

Keep in mind people worldwide are looking for interesting travel experiences. Gene Bryan, state tourism director, says dude ranches and things with an authentic Old West flavor are good bets for travel development. Put the horses on the Internet. They could become famous.

Some environmentalists are troubled by the presence of cattle and sheep on public lands. Frankly, it never occurred to me that they shouldn't be there.

I will say you did yourself no favor by the manner in which grazing was described in the draft plan. I'm sure no one knows better than you how difficult it is to reassure people a 25 percent cut in AUMs is actually not a change.

And your Fifteenmile Watershed ACEC got caught up in the brouhaha. Many people don't trust ACECs. They suspect an ACEC is simply wilderness by another name.

I know "ACEC" is merely another way of saying there are special concerns about an area. But it really doesn't matter what you call it. Designate it the "Joe Johnson Historic Hereford Preserve," if that is more acceptable. What matters is how you manage, and whether the resource is enhanced or diminished.

You might simply want to proclaim that grazing will remain generally at current levels. Changes to protect the resource will be made according to the condition of individual allotments. In the Fifteenmile area, solemnly announce that no ACEC will be designated — according to the wishes of the people — but prudent steps will be taken to reduce sedimentation and to protect the watershed. Which, of course, is about what the plan seeks to do anyway.

And speaking of ACECs, how about that Meeteetse Draw

394.4

petroglyph area? Now we're really talking "custom and culture."

People should be able to enjoy the petroglyphs. But that doesn't mean access should be easy. Vandalism is less likely to be inflicted by a person who must work to reach the site than by a goof casually cruising past with a six-pack on the seat and a 30.06 in hand.

Perhaps there should be a locked gate at Meeteetse Draw, like there is at Legend Rock. A key could be checked out at the BLM office or at Hot Springs State Park. Organized tours and continuing education projects also are good ideas.

This approach may address concerns expressed by the Eastern Shoshones. Speaking of the tribes, the Eastern Shoshones and Crows must be full partners in deciding the fate of both Legend Rock and Meeteetse Draw. It's their heritage you're talking about, after all. Who would presume to manage the Sistine Chapel without consulting the Catholics?

I know that wilderness is beyond the scope of this document, but I cannot imagine, whether in wilderness or not, a higher use for the painted badlands than to leave them alone. These truly belong to the ages.

Please enter my comments into the official record for the draft Environmental Impact Statement of the revised Grass Creek Resource Area Management Plan.

Sincerely,

Sherman T. Mast

e

395

Steve Jones
xxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxx
xxxxxxxxxxxxxxxx xxxxxxxxxxxxxxxx

Cheryl Eisenmann

Page Spahr
xxxxxxxxx
xxxxxxxxxxxxxxxx

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, WY 82401-0119

Re: Grass Creek Management Plan

Dear Mr. Ross:

I am writing to express my concern over the Grass Creek Management Plan. It seems to me your plan manages (or encourages) use by industry, but not recreationists. Wildlife and wilderness considerations are largely ignored. I urge you to rewrite the plan to achieve some balance. Specifically, I suggest you do the following:

1. Close all wilderness study areas to oil & gas leasing, hard rock mining, and motorized vehicle use.
2. Maintain all roadless areas over 5,000 acres as primitive backcountry areas. Manage these areas to promote solitude and backcountry use.
3. Do Not Allow any more roads to be built. Roads affect wildlife more seriously than any other types of construction, because the

[page 2]

access is so greatly increased that hunting pressure increases geometrically.

4. Ban any natural resource development in Areas of Critical Environmental Concern. If they are of critical concern, why let oil & gas or mining companies muck it up?
5. Allow no more than 50% of the acres to be leased to oil & gas development and/or mining combined.

For those of us living in Wyoming, we want to be able to enjoy the public lands in our state. We can only do this if you save some acres for enjoying the land undisturbed, in its natural state.

Please amend your plan accordingly.

Sincerely,

/s/ Page Spahr

/s/ Steve Jones

/s/ Cheryl Eisenmann

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

396

Amoco Production Company
Northwestern U.S. Business Unit
Amoco Building
1670 Broadway
Post Office Box 800
Denver, Colorado 80201
303-830-4040

May 5, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401-0119

Grass Creek Resource Area Resource Management Plan
Draft Environmental Impact Statement

Amoco Production Company (Amoco), a subsidiary of Amoco Corporation, is incorporated for the purpose of exploring for and developing oil and gas resources throughout the United States. Amoco has extensive federal leaseholdings throughout the western U.S., and a continuing interest in the federal land planning process. Amoco has conducted and plans to continue to conduct operations throughout Wyoming; therefore, management policies outlined in the draft EIS would have an impact on Amoco's interests in the area. We appreciate the opportunity to comment on this draft EIS.

The Preferred Alternative in the DEIS/RMP doubles the use of restrictive lease stipulations in the Grass Creek Resource Area. This is not backed by data that support the significant increases in restrictions on future oil and gas exploration and development. It is BLM's obligation to demonstrate that last restrictive measures were considered but found insufficient to protect the resources identified. A general statement that there "appears to be sensitive or nonfishing resource values" does not justify the need to expand restrictions. An examination of the less restrictive measures is critical to the analysis in the Draft EIS.

The Draft EIS indicates historic resources in tar oil and gas fields would be managed for scientific and public use. The purpose of the program would be to improve knowledge of the historic significance of the fields and facilitate the approval of future development and reclamation activities. PAW posed several questions regarding this approach that, to our knowledge, have not yet been answered. These questions were:

1) How does BLM justify this reallocation of time and resources when areas such as southwest Wyoming are in desperate need of archeological surveys for APDs, rights-of-way, etc.?

2) Explain the need to examine these fields for listing.

3) Clarify the benefits derived from listing these fields. Would there be any incentives to spur operator participation? How would designations affect post-production abandonment procedures?

396.2

4) How does BLM plan to handle the National Historic Preservation Act (NHPA) Section 106 consultation requirements to consider possible effects of undertakings on listed districts, sites, building, structures or objects, especially when the proposed new operation is the same or similar in scope to prior activities and operations? Specifically, will BLM impose restrictions that inhibit an operator's ability to explore or operate old equipment or to pursue new technology which might extend production?

Amoco cannot support this program without the answers to these questions

If the Preferred Alternative is adopted, BLM would impose a limit on total surface disturbance to less than 20% in sage grouse habitat. Clarification is needed as to whether other multiple-use activities (in addition to energy and mineral activities) would be subject to no surface occupancy constraints. In general, we favor a case-by-case analysis that takes into account site-specific opportunities for mitigation of adverse effects on sage grouse rather than the impact threshold approach.

Many of the proposed ACECs have significant potential for oil and gas exploration and development. However, it is unclear how such designations will affect opportunities to explore for and develop oil and gas. BLM Manual 1613 requires ACECs to have specific relevance and importance in order to qualify for designation. It is unclear how these proposed designations meet the importance criteria.

In conclusion, Amoco believes that extraction of oil and gas can be accomplished in an environmentally responsible manner without unreasonable restrictions and stipulations. With this in mind, we believe these concerns can and should be addressed in the Final Environmental Impact Statement. Again, we appreciate the opportunity to comment.

J. R. Ruttz
Environmental Specialist

397

5/3/95

Mr. Bob Ross

I am writing in regard to your Grass Creek Resource Area Management Plan. I disapprove of your Preferred alternative. It is slanted away from multiple use and the Historic uses of Oil & Gas, Grazing. The economys of the Locals will be greatly affected by a reduction A.U.M.s. and restrictive Oil & Gas Leases.

I object to createing Wilderness, and Managing Like Wilderness without Congressional approval.

There also seem Like your office has broken many Acts of Congress in making of your Plan.

71 % of alternatives are the same (Nepa) also I believe you are in violation of Wilderness Act, Multipal Use sustain Yelled act., Americans with disabilities act.

I would Like you to turn more to commodity USE and Motorized ReCreation.

Thank you

Michael Tokarczyk /s/ Michael Tokarczyk
xxxxxxxxxxxx
xxxxxxxxxxxxxxxx

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIGHORN, WYOMING

398

May 6, 1995

Tom Easterly
122 N 5th St
Greybull, WY 82426

Bob Ross, Team Leader
Worland District, BLM
PO Box 119
Worland, WY 82407-0119

Mr. Ross:

I am writing as a concerned citizen of the Bighorn Basin. My views are mine alone and do not represent that of any organization or agency.

I would like to commend the BLM on the Grass Creek Resource Area Management Plan. It does consider multiple use, but does not go far enough to protecting the vegetation and wildlife resources.

Livestock grazing will need to be more closely monitored to ensure enough forage is left for wildlife, soil and water protection, and health of the vegetation.

Oil and gas exploration/development does have its place in the area, but timing restrictions should be in place on wintering and parturition areas for big game. Well densities should not exceed a level that will discourage use of the area by wildlife. There should be some areas (e.g. ACEC's) set aside where no development could occur.

Wild horse numbers should be tightly controlled. Too many horses can cause damage to vegetation and soils, just like too many cattle or too many deer. Wild horses should be given lowest priority in all areas, after all species of wildlife and (I hate to say it) livestock.

Some road closures or * vehicle management plan should be developed. More roads are being pioneered every year. This needs to be stopped.

Again, I would like to commend you on a good job. Do not let the anti-government, wise abuse movement sway this plan (or something more resource friendly) from being carried out.

Sincerely,
Tom Easterly

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
BIGHORN, WYOMING

399

WYO-BEN, INC.

Mr Bob Ross
RPM Team Leader
Bureau of Land Management
Post Office Box 119
Worland, WY 82401-0119

May 5, 1995

RE: *Grass Creek Resource Area Draft EIS*

Dear Mr. Ross,

Wyo-Ben, Inc. interests in the Meeteetse Draw area lie not only with our mineral claims, but also with the preservation of the rock art adjacent to the claims. We would like to emphasize from the beginning that Wyo-Ben supports the evolution of a conservation plan for the unique petroglyph sites, especially a plan that includes public viewing and access. We may, in fact, be able to assist ingress and egress through a variety of beneficial, if unrelated, activities associated with our mineral access, and would not rule out other forms of assistance wherever possible.

However, Wyo-Ben could not sanction the proposed Meeteetse Draw ACEC without reasonable assurance that the designation would have a negligible economic effect on us. Particularly, we could not accept any resolution to exclude or impede our ability to explore, conduct mining operations, or further establish viable mineral claims.

We are also concerned about the perception of the general public when clay excavation begins at this site; we are already an award-winning reclamation organization and will continue to maintain our philosophy of environmental excellence. Despite this, there are those who will object to our mere presence regardless of any vested economic interest. Wyo-Ben might have

We are convinced that a variety of solutions exist. Particularly, the EIS would be enhanced by language that accepts bentonite mining as an inevitable use of the land. The EIS could also provide a more flexible definition of "Immediate Vicinity," to allow for the assessment of site specific impact from mining.

We also require clarification of the requirements for conducting exploration work in the ACEC. The 3809 regulations do not provide for a notice in an ACEC, only casual use or a plan. We are not prepared for the additional bonding or permitting requirements that might be created as a consequence of a new designation.

Corporate Office
Box 1168
Lake Shore, Montana 59914
406 889-3 • Telex 4972 Wyoben

WYO-BEN, INC. • WYOMING OFFICE
PO Box 2075
Greybull, Wyoming 82426
406 765-4 • Telex 4972 Wyoben

WYO-BEN, INC.
Billings, Montana, U.S.A.

399.2

The EIS contains information designating disturbance (Table 8) associated with bentonite mining. Supporting documentation describing the specific disturbance and erosion would be appreciated

Isolation of the Meeteetse Draw ACEC to those sandstone outcrops where the rock art exists eliminates any interpretation of mining visibility, unless "adjacency" becomes an issue. Please consider limiting the boundary to the exact location, lithology, and topography of the petroglyphs without imparting a buffer zone

Lastly, Wyo-Ben's participation in the development of a Management Plan is essential. Again, we may be able to offer help in several ways, and the knowledge we gain would allow for the coordination of mining activity with the augmentation of the rock art sites. In such fashion, we can also minimize any impact, perceived or real, to the area surrounding these exciting and important discoveries

If we can assist in any way, please do not hesitate to contact us. Thank you.

Very Truly Yours,
WYO-BEN, INC

Rick Magstadt
General Manager

400

[Wyoming State Legislature Letterhead] [State Seal]

SENATOR CARROLL S. MILLER
Senate District 19
Big Horn/Park Counties
2195 Beaver Creek Road
Shell, Wyoming 82441
Committees:
Corporations, Elections and
Political Subdivisions, Chairman
Judiciary

Team Leader, Grass Creek Management Plan
Bureau of Land Management
Worland, Wy. 82407

Dear Sir:

I am writing to voice deep concern and opposition to many elements and the general threat of the Grass Creek Resource Management Plan.
There is a definite dilution of the multiple-use concepts with significant impacts being felt by all users. I sense an attempt in the document to reflect certain politically correct positions that on closer examination are injurious to both the national and the local interest. For instance, why a reduction in the ability to access potentially valuable oil and gas deposits at a time when our negative trade balance of payments, much of which is the result of increasing oil imports, is threatening our very financial structure? Why the attempt to reduce grazing instead of maximizing use of that renewable resource? Why not serious efforts of the alternative of holistic management of grazing which has worked well in my immediate area?

Please change the direction of your document to maximizing use of this marvelous area, which is, in truth, woefully under-used, as evidenced I'm
[page 2]
sure by the fact that many of your respondents have never been in or about the area or actually know its location. And that brings up a concern about the apparent equal weight factor given to any communication whether the writer has the slightest knowledge of the land or not, and the total implications of what is being proposed.

I would ask your complete reconsideration of the draft and the major problems that the citizenry has with it.

Sincerely yours,
/s/ Carroll S. Miller

401

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 2, 1995

Bureau of Land Management
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401 0119

Attention: Bob Ross

FAX (307) 347-6185

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternative, and recommend that a new preferred alternative be developed with the help of knowledgeable community individuals and representatives from grazing associations, oil, gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below:

1) I object to the reduction of Grazing Aims proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

2) I object to the creation of 'Wild Horse Management' areas. I recommend eliminating the 'Wild Horse Management' areas in the Grass Creek Area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

3) I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

4) I object to the small amount of land considered for suburban expansion.

5) I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intermixed with the BLM Administered lands.

6) I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

401.2

7) I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

8) I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

9) I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

10) I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

11) I object to the lack of detailed descriptions for restrictions.

12) I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Respectfully yours,

Ruth J. Betts

402

BLM
c/o Bob Ross
PO Box 119
Worland WY 82401-0119

Dear Mr. Ross,

Thank you for the opportunity to make my comments on the Grass Creek EIS.

I have been following some of the issues, and it appears to me that the individuals an groups which use the land to drive the local economy are being short-changed. Restrictions such as surface occupancy additions will only hurt the grazing, oil and gas, and timber industries. These are what are most important: the groups which provide jobs. We simply can't afford to have a land management program in place which does things like expanding Wild Horse Management areas.

Sincerely,

/s/ Robert Winland
XXXXXXXXXXXXXXXX
XXXXXXXXXXXXXXX

403

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

BLM c/o Bob Ross
Grass Creek Area Draft EIS
PO Box 119
Worland WY 82401-0119
FAX (307) 347-8198

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives. And recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of 'Wild Horse Management' areas. I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and availability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intermixed with the BLM administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to sustain income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

403.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unauthorized Gray Wolf interventions, and prairie dog- black-footed ferret interventions.

Richard C. Finch

404

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

PARK COUNTY SCHOOL DISTRICT NO. 16

TEETSE WYOMING

WILLIAM EGGERS
Superintendent

LINDA CROSBY
Administrative Secretary

ROBERT KEMMERMAN
Principal

BRADLEY CHAPMAN
Dean for Alt. & Special Services

P. O. BOX 216 • MEETEETSE, WYOMING 82433 • FAX (307) 868-2534 • PHONE (307) 868 2581

April 18, 1995

Bob Ross, Team Leader
BLM
Worland District Office
PO Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

RE: Grass Creek Resource Area Draft Environmental Impact Statement

All entities within the Grass Creek Resource Area will inherit the consequences of the proposed decisions of the Grass Creek Resource Area DEIS which become policy for all to live with. The grave impacts and the process should be questioned.

Every school district within the boundaries of the Grass Creek Resource Area's nearly million acres should have been informed and involved with the formation of this bureaucratic process burden of proof. As members of the Board of Trustees of Park County School District #16, we publish meeting dates, so the democratic process of public involvement can continue in our community. Shouldn't a policy-making document as significant as this have had input in the beginning, rather than reactionary comments at the end? Without due process, school districts are being superseded by the iron rod of "some persons" within a federal agency. It appears as if this process should be changed.

School districts, just like federal agencies, are totally dependent upon the tax base for our well-being. Like you, we do not generate money. That tax base is derived from the efforts of private enterprise. In good times or bad, we are the benefit of the resources. When these private enterprises become over-regulated, everyone loses.

Let's look at the economics of grazing, for instance. This plan calls for an unscientific and unsubstantiated cut of 56,000 AUM's, which according to Dr. Fletcher from the University of Wyoming, are worth $77.50 each to the local economy. That is a loss of $4,340, 000.00 annually to the local economies this "resource" area. The oil and gas proposals, such as time

404.2

Bob Ross - BLM

Page 2

limitations, are hostile to Park County School District #16, because it is 86% dependent upon the oil and gas taxable revenues. We have already "riffed" on our staff. Our district cannot afford a penny's loss.

Schools are primary to the custom and culture in each of the small communities within the Grass Creek Resource Area. The school is the focal point of community activities and the source of pride for individual, team, and community accomplishments. The proposed cuts and losses set forth in the Grass Creek DEIS of the current revenue and taxes derived from oil and gas production and grazing of federal lands will jeopardize schools and their programs for the most valuable resource, our children.

What a few folks at the BLM office in Worland feel is right, will adversely impact this entire area. Due to the economic and the custom-and culture devastation to Park County School District #16, we implore you to withdraw the Grass Creek Resource Area Draft Environmental Impact Statement of which we have had no input.

Yours truly,

John Hogg
Chairman of The Board

Mervin Larsen
Clerk

Charles Raper
Vice-Chairman

Don Miller
Treasurer

Bill Schlenker
Board Trustee

JH:le

cc: Congresswoman Barbara Cubin
Senator Craig Thomas
Senator Al Simpson
Governor Jim Geringer
State Senator Hank Coe
State Representative Peg Shreve
Darrell Barnes
Joe Vessels

405

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

FIRST NATIONAL BANK
AFFILIATE OF PINNACLE BANCORP
"A Family of Independent Banks"

P.O. Box 1369
Thermopolis, Wyoming 82443
Phone (307) 864-5555 • Fax (307) 864-5705

May 5, 1995

United States Department of the Interior
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

Attention: Joseph T. Vessels
Grass Creek Area Manager

RE: Grass Creek Resource Management Plan

Dear Mr. Vessels

Enclosed please find our comments on the Grass Creek Resource Management Plan. Please review them at your convenience.

Sincerely,

Jerry L. Slagle
Branch President

JLS/lu

Enclosures

405.2

FIRST NATIONAL BANK
AFFILIATE OF PINNACLE BANCORP
"A Family of Independent Banks"

P.O. Box 1369
Thermopolis, Wyoming 82443
Phone: (307) 864-5555 • Fax: (307) 864-5705

May 5, 1995

TO WHOM IT MAY CONCERN:

RE: COMMENTS ON THE GRASS CREEK
RESOURCE MANAGEMENT PLAN
ENVIRONMENTAL STATEMENT BY
JERRY L. SLAGLE AND STEVE COUGHLIN
FIRST NATIONAL BANK - THERMOPOLIS

It is very difficult to summarize in a few pages the comments concerning a study that has been going on for years and contains as much information as this plan has.

In trying to breaking it down, it appears that it has roughly three (3) areas of purpose for this study and plan, which are:
(1) Vegetation management
(2) Special management area designations
(3) The recourse accessibility and manageability.

It is lacking in three ways:
(1) The economical impact effecting the residents of the recourse area.
(2) No solution offered to the residents to increase their economic productivity within the resource area.
(3) We fail to see that this document gives any support or encourage any multi-use of public land.

Everything we read within this proposal will restrict or reduce animal units for the ranchers and restrict mineral exploration and extraction practices.

The multi-use description in the Grass Creek Plan will restrict ranch families and oil field workers in their activities, not only in numbers, but restrict their ability to cover the ground. You should be aware, that these are the people that supervise and are the stewards of the land, such restrictions on their travel and their function will certainly have an impact on being up-to-date on condition of the area. True multi-use ground is used for ranching, oil production, hunting, site seeing, wild life habitat and wet lands. Comments within this study show that this is not the intent of the multi-use, but is to restrict many of these activities or uses.

406

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT

WORLAND DISTRICT BLM
BOB ROSS, RMP TEAM LEADER
BOX 119
WORLAND, WY 82401-0119

DEAR SIR

I AM WRITING REGARDING THE GRASS CREEK LAND USE PLAN. I OPPOSE THE PLAN BECAUSE I DO NOT BELIEVE THE INFORMATION USED IN THIS PLAN HAS BEEN RESEARCHED ENOUGH . THE DEFINITION OF EXCESSIVE SOIL EROSION, POOR VEGETATION AND OTHER CONDITIONS ON PAGE 37 OF TABLE 2 NEED CLARIFICATION.

THERE ARE NO NUMBERS OF WILD LIFE AND WILD HORSES IN YOUR PREFERRED PLAN. THERE IS NO DIFFERENCE IN PREFERRED PLAN AND B,B,&C IN GRAZING STRATEGIES ON ELK WINTERING RANGES. I OPPOSE THE BOUNDARIES OF THE ELK WINTERING RANGE.

I THINK NO SURFACE OCCUPANCY IN THE OWL CREEK AREA WOULD BE DETRIMENTAL TO ANY GAS AND OIL PRODUCTION AND IS UNNECESSARY

THE REDUCTION IN AUM'S IN YOUR PLAN HAS NOT BEEN EXPLAINED. THERE IS NO REASONING BEHIND THESE CDTS. MOST OF THE OBJECTIVES ARE NOT ACHIEVABLE IN THIS PLAN, SO I OPPOSE THE ENTIRE DRAFT.

ED SHAFFER
H D RANCE, MANAGER

RECEIVED
MAY 22 1995
BUREAU OF LAND MANAGEMENT
WORLAND AREA OFFICE

407

Hot Springs County Sportsman's Association

THERMOPOLIS, WYOMING

May 2, 1995

U.S. Dept. of Interior
Bureau of Land Management
Grass Creek Resource Area
Worland, WY 82401

ATTN: Bob Ross, BLM Team Leader

The main concern of our Hot Springs County Sportsman's Association is to support or recreational use, particularly in regards to access. The two main areas we would like improved public access are the Red Canyon and Owl Creek/ Duck Creek areas.

The Red Canyon needs access from the north end for right now with a signed parking area. Low impact opportunity by foot or horseback only would be acceptable and minimize damage to this sensitive environment. In the future access through the Owl Creek valley might be obtained through landowner exchange or cooperative agreements.

Access to the South Fork of Owl Creek and Duck Creek up the existing road is vital to the interest of sportsmen and recreational users in Hot Springs County. This area provides an important access corridor for hunting and fishing opportunity to the Paintbrush Wilderness area.

Your continued interest in public access is greatly appreciated.

Sincerely,

Glenn E. Bishop

Glenn E. Bishop
President

408

Bob Ross

As a former resident of Wyo. and still a land owner in the area that will be affected by the Grass Creek Resource Area. I would like to state my objection to the Plan.

All BLM lands should be abel to be used to its full potential. Not set a side for a few selfcentered environmentalest. Who do not have to worry about trying to make a live off of the land.

Further more it is acts like this that are makeing people in the west mad. The government should stand up and take notice or the people in the west are liable to stand up for there rights.

Thank you
/s/ Lewis Mc Sharry

RECEIVED
MAY 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND AREA OFFICE

409

1775 Sherman Street, Suite 2001 • Denver, CO 80203-4313
Telephone 303/860-0099
FAX 303/860-0310

May 8, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
P. O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

On behalf of the Rocky Mountain Oil and Gas Association (RMOGA), following are comments on the Draft Environmental Impact Statement (DEIS) and Resource Management Plan (RMP) for the Grass Creek Resource Area (GCRA). RMOGA is a trade association with hundreds of members, both small and large, who account for more than 90 percent of the oil and gas exploration and development activities in the Rocky Mountain West. As such, RMOGA's members have a vested interest in how BLM intends to manage its lands, specifically with regard to oil and gas activities.

RMOGA is strongly opposed to the Preferred Alternative contained in the DEIS/RMP because it would arbitrarily double the use of restrictive lease stipulations in the GCRA. This management proposal is especially troubling since BLM failed to present data in the DEIS which furnish a basis for the severe increase in restrictions on future oil and gas exploration and development activities. Bureau policy, contained in the DEIS, requires NEPA and planning documents to conclusively demonstrate the need for constraints and that less restrictive measures were considered but found inadequate to protect the resource identified as requiring special protection. This has not been done.

A general remark in the DEIS that there are sensitive or conflicting resource values or uses in an area certainly does not meet analysis or policy requirements. Vague assertions do not constitute justification for expanding lease or operational restrictions. Discussion of specific resources to be safeguarded, along with a discussion of perceived conflicts between it and oil and gas activities, must be given. Furthermore, an examination of the less restrictive measures which could have been utilized must be a fundamental element of the analysis discussed in the DEIS. BLM has not fulfilled these requirements and has, therefore, failed to comply with NEPA analysis standards or BLM Manual 1624 Supplemental Program Guidance for Fluid Minerals.

The DEIS also fails to include a discussion of mitigation measures, operating standards, or guidelines in the DEIS. Section 1502 of the Council on Environmental Quality

409.2

Mr. Bob Ross, Team Leader
May 8, 1995

Page 2

Regulations on the National Environmental Policy Act directs that mitigation measures which could be employed to reduce or entirely avoid impacts to other resource values must be identified in the EIS. While this could be construed to mean that only lease stipulations need to be identified, it is crucial to discuss mitigation which may be utilized at the time of oil and gas drilling, both exploration and development, such as area-wide standards and guidelines for oil and gas operations. This information is of fundamental importance because it illustrates that with appropriate mitigation, oil and gas activities are compatible with other resource uses, including those in sensitive areas.

Throughout the last decade, it has been Wyoming BLM policy to include in the DEIS/RMP an appendix which describes lease stipulations and the parameters for their usage. A similar appendix is also furnished on permit conditions of approval (COA). The DEIS does not provide these essential details. Nor does it address provisions for waiver, exception or modification (WEM) of stipulations or prescribed mitigation measures. WEM's could be granted if site-specific project analysis shows they are unnecessary because the conditions which originally warranted a restriction no longer exist or the location of the proposed activity is moved to avoid such conditions.

We categorically oppose the creation of a CSU stipulation which would place seasonal limitations on the operation and maintenance of oil and gas producing facilities in newly discovered fields. BLM indicates this new stipulation would be used on 61,000 acres of winter ranges, birthing areas and migration corridors. No justification other than additional security would be provided for big game species and their predators is discussed in the DEIS. While added security for big game may be desirable, it is an inadequate reason for such a harsh requirement, particularly when other less stringent measures are routinely used to minimize adverse effects.

Many other means available have been successfully used to mitigate such wildlife concerns, e.g., submersible pumps, automated facilities, and controls on needed access, without resorting to a seasonal cessation of operations. Imposition of seasonal restrictions on production would be irresponsible in light of the technical and economic hardships they would cause, not to mention escalated safety concerns. BLM must recognize the notable advancements in oil and gas technology that have been made before advancing such an onerous proposal. Furthermore, there is no documentation offered to confirm such restrictions would result in any additional benefits to wildlife.

The Shoshone National Forest in its DEIS on Oil and Gas Leasing rejected a similar proposal from environmental groups and the Wyoming Game and Fish Department to impose timing limitations on production activities. Specifically, it is stated on page IV-31 of the Shoshone Leasing DEIS:

"Timing limitations applied through production could have adverse impacts on oil and gas production. Shutting down production can damage reservoirs

409.3

Mr. Bob Ross, Teem Leader
Mey B, 1995

Pege 3

to the point that recoverable reserves decreese, end swabbing, stimulation and workover costs could be required. Elimination of secondery end tertiary recovery opportunities would be possible. Deleys could increasa project life with no financiel benefit, increese project risk, increase cepitel costs, increasa operating and trensportetion cost, and decrease Net Present Value end Rete of Return. There could be steffing problems associated with temporery field operation end increased costs to keep facilities in werm shut-down conditions. Lifting problems could require beam pumps instead of submersible pumps end long project life could increase equipment costs bacause of increased corrosion problems. Transportetion costs could increase due to difficulty in obtaining seasonal transportation end possible climinetion of transportation options such as pipelines. Production would be less, which would decrease tax end royalty payments, limit employment in the field, end increase dependency on unemployment benefits."

References cited in the DEIS for the ebove include BLM end Conoco, Inc., 4/92. There ere no grounds offered in the DEIS for the Gress Creek Resource Area to revise existing Bureau-wide policy not to raquire timing restrictions on production activities. BLM should ebendon this severe proposal in the FEIS.

The DEIS ennounces historic resources in ten oil and ges fields would be maneged for scientific end public use. The purported purpose of the program would ba to improva knowledge of the historic significance of the fields end facilitate the epprovel of futura development end reclemation ectivities. Tha fields involved are Hemilton Dome, Grase Creek, Little Buffalo Besin, Walker Dome, Enos Creek, Golden Eegle, Goosabarry, Hidden Dome, Little Gress Creek and Gebo. In July, 1994, the Petroleum Association of Wyoming (PAW) posed several questions regarding this program. Specifically:

1) How does BLM justify this reallocetion of time and resources when areas such es southwest Wyoming are in desperete need of erch surveys for APDs, rights-of ways, etc.?

2) Explein tha "need" to examine these fields for listing.

3) Clarify the benefits derived from listing these fields. Would there be eny incentives to spur operetor perticipation? How would designatione effect post-production ebendonment procedures?

4) How does BLM plen to hendle the National Historic Preservation Act (NHPA) Section 106 consultetion requirements to consider possible effects of undertekings on listed districts, sites, buildings, structures or objects, especielly when the proposed new operation is the sama or similar in scope to prior activities and operations? Specifically, will BLM impose restrictione that inhibit an operetor's

409.4

Mr. Bob Ross, Team Leeder
Mey B, 1995

Page 4

ability to replace or update old equipmant or to pursue new technology which might extend production?

It is impossible for industry to support this program without first being given an opportunity to eveluate it in conjunction with the concerns described in the questions above. Therefore, we ara using this occasion to once again raquest enswers to tha above questions before the FEIS is published.

BLM indicetes under the Preferred Alternative it would limit total surfece disturbence to less than 20 percent in sage grouse habitet. Evidantly, the 20% objective would include habitat affocted by direct surfece disturbence as well es erees affected by indirect, human presanca activities. An exempla of protecting the erea from indirect disturbance would be to impose a CSU stipuletion within 1/8 of e mile on each side of e road or e quarter mile around a gas well. There is no besis offered in the DEIS for such potentially burdensome mitigation.

Specifically, BLM does not discuss the current condition of sage grouse habitat or the reason for declining sege grouse populations. Moreovar, it is unclaar whathar other multiple-usa activities would be subjact to such constreints or whether only oil end ges activities would heve to bear the full impact of such e constreint. We oppose this impact threshold concept and fevor a case-by-cese analysis which takes into account sita-specific opportunities for mitigating adverse effects on sage grouse. In addition, implementetion of this restriction in pre-existing fields is unfeir becausa the level of ectivity mey be reaching or heve elready reachad the threshold. Thara must be more management flexibility efforded older fields.

Many of the proposed ACEC's have significent potential for oil end ges exploration end davelopment. However, it is unclear es to how such designations will affect opportunities to explore for end davelop oil end ges. Moreover, the BLM has failed to document in the DEIS that the proposed ACEC's meat the designation criteria describad in BLM Manuel Section 1613. These criterie raquira potential ACEC's to heve specific relevanca end importanca in order to quelify for designetion. While these erees may be relevant in tarms of resource velues, tha BLM has not illustreted their importance.

BLM needs to update the geologic informetion used to develop the reasonebly forasaeable development scenerio contained in tha DEIS. The information used in the analysis does not raflect recent industry focus on ges davelopmant. New information is needed before decisions effacting opportunities to explore for and davelop oil end ges resources ere made.

We support the prefarred elternative approech to right-of-way (ROW) management elong routes to Yellowstone Netional Park in that they will not be designeted "evoidance" areas.

409.5

Mr. Bob Ross, Taem Leader
Mey B, 1995

Paga 5

However, these RDW's also must not be subject to increesed restrictions to protect scanic velues.

BLM must address how the updeted GCRA RMP will affect existing leese rights. BLM policy provides that existing leese rights cennot ba chenged by e new plen. Voluntary compliance to tha naw plen should be sought from lessees if activities ere initieted. Nevertheless, BLM needs to specify in the planning documents if and how velid existing leese rights could be impectad by the new leasing decisions. Specifically, potential conditions of epproval for operetions end other changes should be identified.

While the DEIS contains limited socio-aconomic date relating to oil end ges davelopment, it is obvious this information was not e significant fector in tha development of the BLM's preferred alternetive. A comprahensive analysis of the socio-economic benefits of oil end ges development ectivities in the erea must be e major component of tha dacision-making process. We recommend the BLM show in the enalysis a comperison of the cost of edministering the minerals progrem end industry's financial contributions to local, state and federal treasuries. The study must elso include e risk essessment and cost/benefit enalysis to determine whether the benefits outweigh the risks of ellowing less restricted oil and gas development in the area.

Visual Resource Menagement (VRM) requirements ere epplied on public lands or to BLM-approved mineral developmant on split-estate lend. It is our understanding that surface uses on split-estate lands era determined by the surface owner and not the foderal government. BLM needs to clerify ite policy on this issua in the Final EIS.

Again, we appreciate this opportunity to provide you with our comments. If you heve any quastions regarding our views, please do not hesitate to contect me.

Sincerely,

Claire M. Mosaley

Claira M. Mosalay
Director, Public Lends Division

CMM:dm

cc: Bob Armstrong, Assistant Secretary for Lend and Minerals
Micheel Dombeck, BLM Director
W. Hord Tipton, AD Resource Use end Protection
Alen Pierson, Wyoming BLM State Director
Petroleum Associetion of Wyoming

410

RECEIVED
MAY 1 0 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Bob Ross
BLM Team Leader
PO Box 119
Worland, WY 82401-0119

5-5-95

Dear Mr. Ross,

I lived in Wyoming for many years and am familiar with the Grass Creek Resource Area (GCRA). I applaud some of your considerations but am critical of others. My comments on the Draft Management Plan follow:

1. **Too much emphasis on oil and gas leasing and not enough emphasis on wildlife and fisheries, scenic values, historic and cultural sites and water quality.** Opening up all acres of the GCRA to oil and gas leasing is extreme and would violate your Multiple Use Mandate. Please don't forget that multiple-use includes non-extractive uses such as:
-protecting and managing wildlife habitat
-maintaining healthy and functioning fisheries
-protecting water quality and watersheds
-providing opportunities for education and scientific research, recreation and aesthetic values
-preserving important historic and cultural resources
Many of the non-extractive uses would be jeopardized and/or ruined if oil and gas leasing were allowed on every inch of the GCRA. Please follow your mandate more thoroughly.

2. **You should manage more of the resource for Semi-private, Non Motorized Recreation Activities.** Your Plan puts too much emphasis on allowing motorized recreation activities. Even though you predict a significant rise in "semi-primitive non-motorized" use, only 8% of the resource would be managed for hiking, hunting and fishing, wildlife watching, and opportunities for solitude solely. I strongly encourage you to manage all the Wilderness Study Areas for unroaded semi-primitive non-motorized even if Congress does not designate the WSAs as Wilderness, as well as adding more areas to this designation.

3. **The Wilderness Study Areas should be closed to Hard Rock Mining, Motorized Use and Oil; and Gas Development.** I urge you to manage the four WSAs to retain their wilderness character even if Congress does not designate them as such. These spectacular areas should be placed off limits to oil and gas leasing, mineral extraction and motorized use.

4. **More Attention Needs to be Given to Improving the Condition of Riparian Areas and Rangeland.** In our arid West riparian areas are of paramount importance. Please focus more attention on riparian restoration and identifying and preventing sources of riparian damage.
Please be more aggressive in improving the ecosystem health of rangeland by using coordinated range management techniques.

5. **Greater Protection for the Potential National Natural Landmarks from Oil and Gas Leasing and Hard Rock Mining.** Please protect Gooseberry Badlands, East-Ridge- Fifteen Creek Badlands and Tatman Mountain From oil and gas leasing and hard rock mining. Please give these sites the visual resource management classification of VRM II.

410.2

6. Oil and Gas Leasing and Hard Rock Mining Should Be Prohibited in Areas Of Critical Environmental Concern (ACEC). I strongly support the establishment of the Fifteenmile Creek, Meeteetse Draw and Upper Owl Creek ACECs but feel oil and gas leasing and hard rock mining should not be allowed in these areas. Please acknowledge and protect the recreational and natural resource values of the Fifteen Mile Watershed Area.

7. The South Fork of Owl Creek Does Indeed Meet the Criteria for Wild and Scenic River Designation. Please reconsider your decision not to include Owl Creek for NWSR designation. It is a beautiful and pristine stretch and deserving of preservation. And in all events, do not allow oil and gas leasing, mineral development, and roads in the river corridor.

8. More Emphasis Should Be Place on Managing Wildlife and Fish Habitat. Please use stronger language in the Plan's section on fish and wildlife habitat and be generally more committed to the idea. Only the wildlife prescriptions in Alternative C would meet the Wy. Game and Fish Dept.'s objective. I want adequate protection for all big game wintering grounds and expansion of fish and wildlife habitat throughout the Grass Creek Resource Area.

9. Hard Rock Mineral Withdrawals are Important and Should Be Extended to the Wilderness Study Areas. I applaud your proposal to close a few areas of GCRA to hard rock mineral development but strongly encourage you to add the Wilderness Study Areas.

Please keep me informed about the Management Plan process.

And please help preserve some of our public lands in the Grass Creek Resource Area in pristine form for generations to come. Once an area is mined or a river corridor impacted, the damage is forever.

Sincerely,

Lisa Johnson Hammond

Lisa Johnson Hammond

[redacted]

RECEIVED
MAY – 8 1995
BUREAU OF LAND MANAGEMENT
HOLDEN, UTAH

411-430

Citizen Petition Opposing The Grass Creek Management Plan
Petition Number 1

The Grass Creek Management Plan would severally impact the tax base of four counties: Big Horn, Hot Springs, Park and Washakie — though no good purpose is served, and many businesses and residents stand to loose their livelihoods and freedom of access. Therefore, this plan should be scrapped completely, in favor of the present operation plan which the Bureau of Land Management (BLM), admits has worked out well. However, the United States and Wyoming Constitutions ensure the rules should be administering their own state lands.

	Name	Address	Telephone
1.	[illegible]		
2.	[illegible]		
3.	[illegible]		
4.	[illegible]		
5.	[illegible]		
6.	[illegible]		
7.	[illegible]		
8.	[illegible]		
9.	[illegible]		
10.	[illegible]		
11.	[illegible]		
12.	[illegible]		
13.	[illegible]		
14.	[illegible]		
15.	[illegible]		
16.	[illegible]		
17.	[illegible]		
18.	[illegible]		
19.	[illegible]		
20.	[illegible]		

RECEIVED
MAY – 8 1995
BUREAU OF LAND MANAGEMENT
HOLDEN, UTAH

431-450

Citizen Petition Opposing The Grass Creek Management Plan
Petition Number 2

The Grass Creek Management Plan would severally impact the tax base of four counties: Big Horn, Hot Springs, Park and Washakie — though no good purpose is served, and many businesses and residents stand to loose their livelihoods and freedom of access. Therefore, this plan should be scrapped completely, in favor of the present operation plan which the Bureau of Land Management (BLM), admits has worked out well. However, the United States and Wyoming Constitutions ensure the rules should be administering their own state lands.

	Name	Address	Telephone
1.	[illegible]		
2.	[illegible]		
3.	[illegible]		
4.	[illegible]		
5.	[illegible]		
6.	[illegible]		
7.	[illegible]		
8.	[illegible]		
9.	[illegible]		
10.	[illegible]		
11.	[illegible]		
12.	[illegible]		
13.	[illegible]		
14.	[illegible]		
15.	[illegible]		
16.	[illegible]		
17.	[illegible]		
18.	[illegible]		
19.	[illegible]		
20.	[illegible]		

RECEIVED
MAY – 8 1995
BUREAU OF LAND MANAGEMENT
HOLDEN, UTAH

451-470

Citizen Petition Opposing The Grass Creek Management Plan
Petition Number 3

The Grass Creek Management Plan would severally impact the tax base of four counties: Big Horn, Hot Springs, Park and Washakie — though no good purpose is served, and many businesses and residents stand to loose their livelihoods and freedom of access. Therefore, this plan should be scrapped completely, in favor of the present operation plan which the Bureau of Land Management (BLM), admits has worked out well. However, the United States and Wyoming Constitutions ensure the rules should be administering their own state lands.

	Name	Address	Telephone
1.	[illegible]		
2.	[illegible]		
3.	[illegible]		
4.	[illegible]		
5.	[illegible]		
6.	[illegible]		
7.	[illegible]		
8.	[illegible]		
9.	[illegible]		
10.	[illegible]		
11.	[illegible]		
12.	[illegible]		
13.	[illegible]		
14.	[illegible]		
15.	[illegible]		
16.	[illegible]		
17.	[illegible]		
18.	[illegible]		
19.	[illegible]		
20.	[illegible]		

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RAWLINS, WYOMING

471-481

Citizen Petition Opposing The Grass Creek Management Plan
Petition Number 4

The Grass Creek Management Plan would unwisely impact the no-base of four counties: Big Horn, Hot Springs, Park and Washakie — through no good purpose is served, and many businesses and residents stand to loose their livelihoods and freedom of access. Therefore, this plan should be scrapped completely, in favor of the present operation plan which the Bureau of Land Management (BLM), admits has worked just well. However, the United States and Wyoming Constitutions ensure the states should be administering their own state lands.

	Name	Address	Telephone
1	John Lafta		
2	Donald R Kinney		
3	Sally M. Brown		
4	Robert J. Barton		
5	J. W. Pritchett		
6	Ben Smith		
7	Doris Williams		
8	Jerry Sass		
9	Ben Kinney		
10	Jack Pendergrass		
11	Nickie Lafta		
12			
13			
14			
15			
16			
17			
18			
19			
20			

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RAWLINS, WYOMING

482-493

Citizen Petition Opposing The Grass Creek Management Plan
Petition Number 5

The Grass Creek Management Plan would unwisely impact the no-base of four counties: Big Horn, Hot Springs, Park and Washakie — through no good purpose is served, and many businesses and residents stand to loose their livelihoods and freedom of access. Therefore, this plan should be scrapped completely, in favor of the present operation plan which the Bureau of Land Management (BLM), admits has worked just well. However, the United States and Wyoming Constitutions ensure the states should be administering their own state lands.

	Name	Address	Telephone
1	Evelyn Jones		
2	Anna Johnson Johnson		
3	Michael McMillan		
4	Christine McMillan		
5	David Boyert		
6	Kasen Barnes		
7	Amy Barnes		
8	Roberta Barnes		
9	Diamie Barnes		
10	Jason M Barnes		
11	Bill Murrell		
12	Don Clark		
13			
14			
15			
16			
17			
18			
19			
20			

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RAWLINS, WYOMING

494

May 7, 1995

Bob Ross
Team Leader
P O Box 119
Worland, WY 82401-0119

Dear Mr Ross,

This is intended as an overall comment on the proposed Grass Creek Resource Area Resource Management Plan. It appears to me to be too wide and sweeping for any problems that are currently affecting the area. "Hobby collection of invertebrate animals would be allowed in specified areas". Is this a change from current policy? What areas and what size will be available? Recreation appears to be strongly promoted. Are you proposing to set up two acre plots for tourists to pick for fossils? Is there a problem with this sort of thing now? So much of the plan seems to mandate control over situations which you already control. The preferred alternative on grazing management seems to be primarily a proposal to cut AUMs regardless of management changes, range improvement or any other extenuating circumstances. In my experience the BLM already has the authority to adjust permits to conditions. If there is a problem why not solve it. Currently I would assume that grazing and Oil and Gas exploration are important to the socio-economic structure of several Counties and many individuals and should be encouraged when conducted in a responsible manner. I am dubious about your proposals regarding Wild Horses. I am concerned about predator control, and noxious weed control on these 1,483,700 acres.

Please give careful consideration to this proposal and thought to modification.

Sincerely,

Glen Booth

495

ALTAMONT
GAS TRANSMISSION COMPANY
P. O. Box 2511
Houston, Texas 77002

RECEIVED
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
RAWLINS, WYOMING

5 May 1995

Bob Ross, Team Leader, Grass Creek RIS
Worland BLM District
Bureau of Land Management
101 South 23rd Street
Worland, WY 82401

VIA FEDERAL EXPRESS

Re: Grass Creek Resource Management Plan Draft Environmental Impact Statement

Dear Mr. Ross:

Altamont Gas Transmission Company ("Altamont") submits comments on the Grass Creek Resource Management Plan (RMP) Draft Environmental Impact Statement (DEIS).

The DEIS (page 111) acknowledges Altamont as a proposed project. However, Altamont is far beyond simply the proposed stage. Altamont has already received certification from the Federal Energy Regulatory Commission (FERC) on 1 August 1994, and the Bureau of Land Management (BLM) was a party to that process. Furthermore, BLM issued a Record of Decision for the Altamont project on 29 July 1994.

Altamont wishes to ensure that its processing authorization, and the conditions under which the pipeline will be installed and operated, are not compromised by the RMP. Altamont is committed to constructing and operating its pipeline in an environmentally responsible manner, and considerable adjustments to accommodate environmental concerns have already been made during the planning process. The FERC Certificate imposes stringent environmental guidelines and mitigation measures, and the BLM Plan of Development (POD), currently being formulated in conjunction with BLM staff, will also be comprehensive and thorough. However, Altamont is concerned that measures proposed in the DEIS will affect the measures already in place and those currently being developed. The specific comments that follow (see attached table) reflect that concern.

Therefore, Altamont requests that the Final Environmental Impact Statement for the Grass Creek RMP acknowledge Altamont as a processing project governed by the conditions of the FERC certificate and the BLM Plan of Development, and not governed by any new conditions of the RMP.

Sincerely,

Robert A. Hoang
Environmental Manager
(713) 757-3700

Subject	Page	Paragraph/Map/Table	Issue
Wildlife Resources	79	Table 3	Under **Preferred Alternative**, discussion of timing restrictions include no surface-disturbance or disruptive activities within 0.5 mile of raptor nests or within view of nests, whichever is closer. Prefaces "raptor nests" with the word "active", as numerous nests exist within this resource area and along the Altamont ROW. It would be entirely too restrictive to place activity restrictions on every nest observed. Alternant also suggests that the NSO restrictions for raptors identify the raptor species for designation of special federal or state status recognized which fall into these restrictive categories.
Wildlife Resources	80	Table 3	**Alternative B** would be the least restrictive option impacting Altamont. Mitigation stipulations outlined in the FEIS would reflect the site-specific analyses required for these actions. The **Preferred Alternative** and **Alternative C** directly impact Altamont, restricting construction and/or creating costly ROW adjustments.
Wildlife Resources	81	Table 3 Para. 2	The **Preferred Alternative** for surface disturbance of other sets appears more flexible than **Alternative C**, which prohibits any surface disturbance.
Wildlife Resources	82	Table 3 Para. 1	*Alternative A* would impact Altamont, despite site-specific environmental analyses being conducted. This paragraph is confusing in light of page 81's discussion of set disturbance. Perhaps this paragraph should be included on page 81 under *Alternative A*.
Wildlife Resources	82	Table 3 Para. 2	"Surface-disturbing activities would be prohibited within 0.5 mile of the Bighorn River (1,200 cfs)." Altamont would be impacted if it required access to the river

495.4

450

Subject	Page	Paragraph/Map/Table	Issue
Wildlife Resources	82	continued	through public land.
Rights-of-Way Avoidance Areas	89	Map 8	This map delineates Highway 16/20, which Altamont parallels with its ROW, as being in Avoidance Area. This directly and significantly impacts Altamont. The Altamont ROW should be acknowledged on this map as a pre-existing facility.
Limits on Surface Disturbance	92-95	Maps 11-14	All Alternatives but **Alternative B** would impact Altamont's proposed ROW due to delineated areas of No Surface Occupancy and Timing Restrictions. **Alternative B** is the least restrictive. The Altamont ROW should be acknowledged on this map as a pre-existing facility.
Activities Affecting Soils & Estimated Acres and Durations of Disturbance	126	Table 5	Under the **Lands and Realty** section, a pipeline has been estimated to have 2 acres of disturbance per mile and 24 tons of soil loss per acre per year with a permanent impact duration. This soil loss estimate, footnoted in the table, has been based on "...removal of ...soil, ...caused by erosion or by direct human activity such as road construction...". Altamont has planned extensive reclamation procedures based upon BLM Reclamation Standards. A reclaimed pipeline should not be compared to an unreclaimed dirt road in terms of impacts and soil loss. The duration of the impact should be labeled **temporary**, as BLM refers to the temporary nature of pipeline construction in Table 16 (page 176) where "...following reclamation of these areas (pipeline construction, surface mining,...), forage production would return to pre-disturbance levels.".

495.5

IDENTIFICATION OF ISSUES IN THE GRASS CREEK RESOURCE AREA
RESOURCE MANAGEMENT PLAN AND DRAFT EIS
POTENTIALLY AFFECTING THE ALTAMONT PIPELINE ROUTE

Subject	Page	Paragraph/Map/Table	Issue
ALTERNATIVES*			
Lands and Realty Management	33	Table 2	Under the **Preferred Alternative** and **Alternative B** most of the planning area would be open for rights-of-way development. Two right-of-way corridors would be designated as seen on Map 7, pg. 88. **Alternative A** discusses rights-of-way without designating specific corridors; rather it designates "concentration areas" as the preferred locations for future rights-of-ways. **Alternative C** is the same as Alternative A according to the Table. However, on Map 8 (identified as Rights-of-Avoidance Areas) Alternative C excludes conveyance in the proposed Altamont ROW, identifying that area as a ROW Avoidance Area, thereby impacting Altamont. The table is confusing to read.
Minerals Management	43-44	Table 2	Under the **Gas and Oil** discussion of Alternatives, surface disturbance restrictions would be placed on areas up to 144,400 acres, depending on alternatives. Altamont is concerned with no surface occupancy and surface disturbance stipulations requirements for the oil and gas industry. Would NSO stipulations apply to a subsurface pipeline?
Off-Road Vehicle Management	49	Table 2 para. 1	Restrictions prohibit off-road vehicle use for wet soils and on slopes greater than 25% if unnecessary damage to vegetation, soils, or water quality would result. Would this apply to construction equipment? If so, a "necessary factor" work exemption should be applied.

*Assume the issue is applicable to all alternatives unless otherwise stated.

495.2

Subject	Page	Paragraph/Map/Table	Issue
Vegetation Management	61	Table 2	DFC (Desired Plant Community) Objectives for Sage Grouse Nesting Habitat stating "vegetation requirements: vegetation within two miles of leks groups lek areas to cover 20-40% of the ground", may impact placement of right-of-way and/or revegetation plan for plant species other than that described in the FEIS. Altamont has formulated seed mixtures for revegetation to match existing vegetation and thus should not be subject to any additional guidelines.
Watershed Management	65	Table 2	"To protect watershed values, driving would be prohibited on wet soils and on slopes greater than 25% if unnecessary damage to vegetation, soils, or water quality would result." A "necessary factor" work exemption should be applied.
Wildlife and Fish Habitat Management	71	Table 2	Under **Wildlife Habitat** discussion for the preferred alternative, restrictions suggested in the following paragraph may impact the certificated ROW proposed by Altamont. "Nest sites, roosts, spring/summer areas and other potential critical habitats related to hunting and concentration areas for bald eagles would be protected, especially along the Bighorn and Greybull Rivers...".
Miscellaneous Resources	78	Table 3	Restrictions placed on surface-disturbing activities described in this paragraph may affect Altamont, although Altamont recognizes that site specific environmental analysis will be conducted on these actions.

495.3

496

[Copy Faxed to BLM May 9, 1995-ED.]

Hon Michell
Director of Agriculture
2219 Carey Ave. Cheyenne, Wyoming 82002-0100 (307) 777-7927 Fax (307) 777-6505

MAY - 9 1995

May 9, 1995

BUREAU OF LAND MANAGEMENT
ATTN: BOB POREE
RMP TEAM

RMP Team Leader
Worland District BLM
P.O. Box 119
Worland, WY 82401-0119

Dear Mr. Poree:

Following are our comments on the BLM Draft Environmental Impact Statement for the Grass Creek planning area.

We are greatly concerned about the crippling impacts the proposed unwarranted reductions in AUMs will have upon the agriculture producers and economies of this rural area.

In conversations with the citizens and officials living in this area, I learned that little coordination with local resource users occurred in the preparation of this plan, and the DEIS suffers accordingly. I strongly encourage your close coordination with the people, governments, interests, and agencies who will be most affected by this plan during the preparation of the final EIS. These folks possess experience and knowledge that will make this plan more precise, efficient, and useful.

You propose reductions from the current 157,355 AUMs to an preferred alternative AUMs of 104,412, but you have not included specific monitoring evidence to justify the reduction. There is insufficient evidence of specific range and soil health to justify your desired goal. Your erroneous and unwarranted conclusions about for collaborating evidence, and they need to be in the EIS, or your decisions need to be modified accordingly.

In fact, I believe adequate monitoring of the area would justify managing the resource at the current level of 157,355 AUMs. Moreover, the present increases in technology and coordination, that have been leading to increased rangeland health on those and other BLM management areas in Wyoming, strongly bolster this view.

I believe you must consider also the horrifying consequences of your proposed actions in the DEIS upon the continued existence of agriculture producers and rural economies in this area.

Based upon inadequate specific monitoring evidence, you intend to void 54,943 AUMs that in all likelihood will never be replaced. These represent a 35 percent reduction, as you note on p. 177. These lost AUMs represent disabling impacts on the agriculture producers who depend upon these AUMs for their livelihoods.

BOARD MEMBERS

Michael L. Dubois Livestock	Elaine Moore Elevator	Hughie Fox Feedlots	Ed Simons Dairyman	Donald Yoder Wool
			Del Stanley Marketing	Donald Yoder Sheep

496.2

This loss is not adequately reflected in the DEIS. The lost AUMs represent an estimated decline in total economic activity greater than $6.5 million, based on a conservative $100 generated by each AUM. University of Wyoming estimates for similar areas indicate a total loss of $117 per eliminated AUM in total economic activity for an affected area. The area affected by the Grass Creek RMA is purely rural and simply can not withstand the loss of five-plus million dollars caused by the reductions in AUMs that you propose. In fact, the people in this area would have difficulty absorbing a million dollar loss represented by a 10,000 AUM reduction. This economic factor must be illustrated in the EIS and be considered in your decisions.

Because these federal lands supply critical seasonal grazing that can not be replaced on private lands, the impact of the lost AUMs is far greater than the indicated 54,943 AUMs. The corresponding economic impact upon the lives of the folks in this rural area is likewise magnified.

The loss of agriculture producers also has terrifying impacts for the wildlife and other natural resources of the Grass Creek RMA. Within the last decade, dwindling acreages have forced the sale of ranches throughout western states, including Wyoming. Sales have often resulted in subdivisions and ranchettes, with a corresponding loss in open space, wildlife habitat, wildlife migration, and an increased destruction of natural resources that the RMA is trying to protect. For this reason, I disagree vehemently with your conclusion that reduced livestock grazing will have beneficial effects on wildlife habitat. As I've noted, the likelihood is that reduced grazing possesses the potential for profound destructive consequences.

Bottom line: severe reductions in AUMS will irreparably harm livelihoods and natural resources.

Following are comments upon specific areas.

In the DEIS (p.181), you propose to designate the Fifteenmile Creek watershed as an Area of Critical Environmental Concern. You implicate grazing as the culprit for increased sediment delivery with no collaborating evidence and without any reference to the natural erosion that is common to an area of naturally erodible soils. In addition there is no collaborating data to support the claim that "hydrologic processes are not functioning."

Desired Plant Community standards that are addressed on pps 56-61 are extremely vague and are better addressed at the allotment level with permittees and other involved interests.

We believe the prescribed burning needs to be increased to offset years of fire suppressions, especially in areas of sagebrush/pine/juniper areas.

496.3

On p. 72, you state that control measures directed toward coyotes and other predators would be evaluated by BLM, AUMIS and affected public land users before implementation. I believe that your proposals also need to be coordinated with appropriate state officials.

I want to thank you for the opportunity to comment upon this DEIS, as it has major consequential, negative impacts upon the people and the natural resources of the Grass Creek RMA.

Sincerely,

Hon Michell

Hon Michell
Director of Agriculture

cc: Governor Geringer
Jim Magagna
Board of Agriculture

497

05/10/95 14:52 9684754384 OIL PG 001

RECEIVED
MAY 10 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

INSPECTION
JB FAX 6/8/95

[redacted]

May 9, 1995

Bureau of Land Management
P. O. Box 119
Worland, Wyoming 82401-0119

Attention: Mr. Bob Poree, RMP Team Leader

Dear Mr. Poree:

I have completed a review of the four alternatives set forth in the Grass Creek Resource Area RMP Draft EIS. I believe you have completed an excellent document and concur with most of the prescriptions set forth in the Preferred Alternative. However, I would suggest that you re-consider the use of the No Surface Occupancy (NSO) and Controlled Surface Use (CSU) stipulations for oil and gas leases in the preferred alternative.

Over the last 15 years, I have followed with great interest the oil and gas activity in the planning area. My experience is that such provisions are not necessary except for protection of obvious, site-specific resources such as known paleontological sites. In most cases, the BLM requires measures to be taken to protect the protected such stipulations enhance and mitigates the same with the lessee at the time a specific drilling and development plan is submitted for approval.

The federal oil and gas lease from acquires a lessee's operations minimize adverse impacts to the environment. The discussion of CSU stipulations on page 191 of the Draft EIS recognizes that the specific terrain, etc. of the proposed development usually results in the selective placement of facilities. Under the current plan, the EIS indicates that wildlife populations have slowly increased. So, why add unnecessary restrictions where a problem is issued? Such restrictions deter responsible operators from development and production will not reach the levels set forth in under the Preferred Alternative.

By eliminating these stipulations, operators will be encouraged to replace the planning area. Most fields will be found with a greater environmental impact than wildlife or the people. With appropriate mitigating measures applied for the lease, the BLM can be assured that reasonable and responsible development will not adversely impact historic and cultural resources, genetic and biologic diversity and recreational or other users of the public land.

Thank you for the considering these comments.

Sincerely,

David E. Davenport

Post-it® Fax Note	7671	Date	5/8/95
To Bob Poree		From	Dr. David Poet
Co./Dept. BLM		Co.	
Phone #		Phone #	
Fax # 307-347-6195		Fax #	[redacted]

P-41

498

RECEIVED
MAY 8 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

May 5, 1995

Mr. Bob Ross, Team Leader
Grass Creek Resource Area RMP
Bureau of Land Management
P. O. Box 119
Worland, WY 82401-0119

Dear Mr. Ross:

The Grass Creek Resource Area Resource Management Plan, Draft Environmental Impact Statement does not have an alternative that will not adversely impact the people who have lived in this area and developed communities based on good social, economic and cultural values.

The management plan that you are proposing decreases the use of the lands for grazing cattle, and you do not give sufficient data to justify the decrease in grazing AUMs. Would you please supply me with information as to how many AUMs have been eliminated in this district by reductions when sales of property occur, and when permits are changed as to usage from sheep to cows, etc. I have been told that there is a natural reduction of 60% over the years throughout the state.

There should be no further efforts made to provide additional lands for wild horses. No one gets to view wild horses, and they are very destructive to the lands, and impact private lands. You have to give justification for every proposal in this plan and the impact it will have on private lands. You have not adequately addressed the impact to private lands.

The Nature Conservancy should not be involved in any programs that involve these resource lands. The federal agencies are there to protect the resource.

You have received many letters (or cards) from members of environmental groups repeating the same thing, as follows: designate the bedlands as ACEC; protect all areas in conservation wilderness; protect recreation SRMAs from oil development, define goals to address overgrazing that can be met within 5 years. What do these people know about overgrazing? We can not allow theorists with no investment in the area to determine the

P-41

498.2

future of this resource area. You have regulations to work with to manage every type of grazing concern. You cannot even find agreement among the range professionals on criteria to judge the resource; therefore, you cannot give credence to groups that do not understand the resource.

I have always been concerned about the numbers of wildlife allowed to flourish with their numbers being set by the Wyoming Game and Fish. When elk was introduced on Copper Mtn., the Wyoming Game and Fish discussed the costs with ranchers and arrived at the figure of 75 as being a sufficient number. In 1988, during a drouth, when we decided to lease land elsewhere and rest our land on Copper Mtn., a neighbor counted 300 head of elk grazing our private lands. The BLM has 18% of the lease, and the elk were all in the lease, not on the BLM slope.

You have laws enacted by Congress, and regulations written for the management of the lands while protecting the social, cultural and economic well being of the people of Wyoming. Do not follow the dogma of environmental groups who wish to socialize all lands in the West by eliminating the commodity users on federal lands. Listen to the input of state and local government representatives as to what will benefit Wyoming while protecting the resource. Do not follow the policy being directed from Washington that conflicts with the laws enacted by Congress.

Thank you for the extension allowing more input to the draft EIS on the Grass Creek Resource Area RMP.

Sincerely,

Lois G. Herbst

Lois G. Herbst
General Partner,
Herbst Lazy TV Cattle Co.

LGH

The exploration for oil and gas is very necessary to the infrastructure of the state of Wyoming. NEPA requirements are followed and strict regulations are in place by many agencies supervising the drilling of oil and gas wells. There is no need to curtail development in any part of the Grass Creek Resource Area.

499

REC
MAY - 8 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

SPEAK UP FOR WILDLIFE FOUNDATION
Box 84006
PO Market Mall
Calgary, Alberta
Canada
T3A 5C4

1 May 1995

Bureau of Land Management
Bob Ross, Team Leader
Box 119
Worland, WY
U.S.A. 82401

Dear Mr. Ross:

RE: GRASS CREEK RESOURCE AREA MANAGEMENT PLAN AND DEIS

Please send me a copy of the above plan.

I am interested in my supporting *biological opinions* that may be available regarding the plan and issues related to it.

Enclosed please find a copy of a draft document relating to habitat fragmentation by the oil and gas industry in Alberta. It is probably relevant to Wyoming. I trust you will address the issues raised in the attached document in the DEIS.

Thank you for your prompt attention.

Sincerely,

Brian L. Horejsi

Dr. Brian L. Horejsi

cc. WY Outdoor Council

BLH/me

[Included with this letter was the *Habitat Fragmentation by the Oil and Gas Industry in Alberta and British Columbia: It's Impact on Wildlife* Draft by Brian L. Horejsi, Wildlife Scientist; Western Wildlife Environments Consulting Ltd., Calgary, Alberta, Canada T3A 5C4, March 1995.]

500

WYOMING OUTDOOR COUNCIL 25 1967-1992

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
CASPER, WYOMING

May 3, 1995

Mr. Bob Ross
RMP Team Leader
Worland District BLM
P. O. Box 119
Worland, Wyoming 82401

Re: Grass Creek Draft RMP/EIS

Dear Bob:

Thank you for inviting the Wyoming Outdoor Council (WOC) to review and comment on the adequacy of the Grass Creek Resource Area's Draft Resource Management Plan (RMP) and accompanying environmental impact statement (EIS). Established in 1967, WOC is a non profit, grass-roots-based, statewide organization dedicated to the conservation of Wyoming's natural resources and protection of its environment. As you develop the final RMP and EIS, please consider the following:

The writers and editors of the Draft EIS and RMP deserve much credit for putting together a document that is, for the most part, understandable and clearly written. The format of the RMP, however, leaves a lot to be desired. Our biggest complaint is with Chapter Four, Environmental Consequences. This section should facilitate a comparison of alternatives. Instead, it facilitates confusion, and is difficult and time consuming to use. On page 183, Tables 15 and 16 interrupt the discussion of the environmental consequences of the preferred alternative. The narrative resumes on page 189. Can't these tables be placed somewhere else, for example, at the beginning or end of a section. Also, the absence of title or some other form of identifier makes the environmental consequence discussion of one alternative difficult to distinguish from another. Displaying the heading (e.g., "Alternative C") more conspicuously, perhaps at the top of the page, would be helpful. In addition, all maps and tables should be consolidated in one place in the document.

Unfortunately, a readable document is not necessarily a legally adequate document, or one that WOC can support. The draft RMP places far too much emphasis on the production of commodities such as oil, gas, and timber, at the expense of other important values and resources such as semi-primitive recreation opportunities, wildlife habitat, and scenic values. Although the document promises these resources and values will be protected for the lack of specific allocations for them in the RMP make such promises difficult to fulfill. For example, assuming for the sake of argument, if the energy industry decided to develop in the next 10 years every outstanding oil and

25 years of Wyoming Conservation Action

201 Main Lander, Wyoming 82520 (307) 332-7031

500.2

gas lease in the resource area, how could BLM provide adequate wildlife habitat and a mix of recreational opportunities.

The draft plan proposes oil and gas leasing on every single available acre of public land within the resource area--including prime grizzly bear habitat, crucial winter range for elk, moose, mule deer, antelope, and big horn sheep, areas of critical environmental concern, and undeveloped primitive recreation areas. The plan also fails to adequately address declining resource conditions caused by overgrazing, off-road vehicle use, and poor management practices. Instead, the plan reflects the BLM's traditional emphasis on the development and exploitation of natural resources: oil and natural gas production, hard rock minerals mining, livestock grazing, and commercial timber harvesting. Other uses and values, recognized and supposedly protected by federal law, such as wildlife and fisheries, scenic values, historic and cultural sites, and water quality, continue to play "second fiddle," and suffer as a result.

Multiple Use Management?

By law, the BLM must manage for multiple use and sustained yield. We feel this basic mandate is not being met when an alternative disposition of BLM authorizes oil and gas leasing on every single acre of legally-available land in the Resource Area; when the BLM alleges commercial logging is necessary to "improve" forest health and offers a "range of alternatives" for this resource that is basically illusory; and when fewer than 8% of the resource area is available for semi-primitive recreation, and even less --about 1%- if Congress decides not to designate the WSAs as wilderness.

The RMP indicates on page 14 that:

> nearly the entire planning area is covered by federal oil and gas leases, and portions of the area are developed. *This situation would continue for the entire time this plan is in effect.* Eliminating federal oil and gas leasing in the entire planning area would be overkill because resource conflicts tend to be located in specific areas, not area wide (emphasis added).

We have a few comments regarding this statement. First, we know of no group or individual that is advocating the elimination of oil and gas development in the Grass Creek Resource Area, and detailed consideration of such an alternative would clearly be unwarranted. However, WOC represents a large group of individuals who believe oil and gas leasing and development on public lands is not appropriate in certain areas, such as crucial big game winter range, calving grounds, and travel corridors, sensitive watersheds, habitat for threatened, endangered, and sensitive species, areas with unique scenic and aesthetic values, in areas that are spiritually significant to Native Americans, and in important primitive and semi-primitive recreation areas. Prohibiting oil and gas development in these areas clearly would not be "overkill." Far from it. Such action represents prudent stewardship and long-range thinking that is so often lacking in government decisionmaking.

500.3

Second, the italicized statement in the indented quote presupposes the outcome of this planning effort. Although the entire planning area may presently be covered by oil and gas leases, whether it is in the future is a decision that should follow -not precede- this planning effort. Like all federal oil and gas leases, the leases covering the Grass Creek Resource Area are issued for a prescribed period of time, typically 10 years in the absence of production. Because the leases were issued at different times, they expire at different times. Thus, the fact that an area may be subject to a lease today does not dictate that it must be forever. We think BLM owes the public an explanation as to why it has already decided to lease the entire resource area before the planning process has been completed.

So there is no understanding, you should also explain to the public that there is no law requiring you to lease public lands (the Mineral Leasing Act is discretionary); that you could decide to lease 3/4, 1/2, or 1/4 of the resource area (or any other amount less than the sum of the resource area) if you chose to; that an individual oil and gas lease is a few thousand acres (under 6,000) in size, and that offering one lease does not commit the government to commit to offering another; and that the issuance of a lease is an irretrievable and irreversible commitment of resources that all but eliminates the BLM's ability to prohibit development on the lease.

Third, the statement reveals the BLM's strong bias in favor of mineral production. There is no federal law that requires the BLM to lease every square foot of public lands under its jurisdiction, yet that is exactly what this plan says it will do.

The BLM's traditional deference to the production of commodities (not only here in Wyoming, but also Nationwide) has resulted in the significant loss of wildlife habitat and biodiversity, contributed to the destruction of nearly all of our virgin forest land (approximately 8% remains), caused significant water quality degradation, accelerated the permanent loss of soils, assisted the destruction of cultural, historical, and Native American spiritual sites, and has significantly impaired recreational and scenic values nationwide. Unfortunately, the BLM's traditional deference to the production of commodities is reflected in the Grass Creek RMP.

With the exception of the WSAs, the proposed plan authorizes oil and gas development on every single acre of public land within the resource area, including areas of critical environmental concern, sensitive wildlife habitat, and undeveloped recreation lands. The RMP claims (page 14) the BLM has a mandate to lease everything, but curiously, is unable to point to any law demonstrating the basis for such a policy. A policy that leads to the widespread and extensive industrialization of public lands does not meet the requirements of multiple use and sustained yield under which BLM must operate. By law, multiple use includes much more than just mining, grazing, timber cutting, and mineral development. As defined by Congress, multiple-use includes non-extractive uses such as protecting and managing wildlife habitat, maintaining healthy and functioning fisheries, protecting water quality and watersheds, providing

500.4

opportunities for education and scientific research, recreation, and aesthetic values, and preserving important historic and cultural resources.

This issue was the topic of two earlier letters submitted by WOC on the Grass Creek RMP, which are appended herein for your information. We would like a written response to the points raised in the letters, since there is no indication they were considered in the EIS/RMP.

Ecosystem Management and the Greater Yellowstone Ecosystem

We find it interesting that although the BLM is now espousing "ecosystem management," the fact that a significant portion of the 1.5 million acre Grass Creek Resource Area comprises an integral part of the Greater Yellowstone Ecosystem in Wyoming is barely noted in the EIS/RMP. Moreover, the map on page 2 does not show the Wind River Indian Reservation, which lies immediately south of the Grass Creek Resource Area. Notwithstanding the rhetoric, it appears the BLM's thinking and policy decisions are still very much oriented along and dictated by artificial political boundaries. We have included a map of the GYE for your information.

Management of Wilderness Study Areas

The Grass Creek Resource Area contains four BLM-designated wilderness study areas: Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands. These areas combined total only about 56,000 acres, less than 6% of all public lands in the resource area. For the most part, these small to moderately-sized WSAs are the only areas within the resource area able to provide a semi-primitive, unroaded backcountry experience. The RMP proposes to open these WSAs to oil and gas development, hard rock mineral mining, road development, and other conflicting uses if the Congress decides not to designate the WSAs as wilderness. WOC's members feel strongly that Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands wilderness study areas should be managed to retain their wilderness character even if Congress decides against wilderness designation. Under the proposed management plan, if Congress fails to designate the WSAs as Wilderness, those areas could be severely impacted by mineral development, off-road vehicle use, and oil and gas leasing and development. Regardless of whether they are ultimately designated wilderness, these spectacular areas should be placed off-limits to mineral extraction, oil and gas development, and use by motorized vehicles. Alternatives to the proposed management scenario must be considered in the EIS and made available for public comment. Consideration to the Citizens Wyoming Wilderness Proposal must also be given.

Lack of Semi-Primitive Recreation Opportunities

The RMP should make available more of the resource area for semi-primitive, nonmotorized recreation activities. The proposed resource management plan places unacceptable emphasis on providing motorized recreation activities. The Grass Creek Resource Area covers nearly 1.5 million acres, 968,000 acres of which are public lands.

500.5

Under the current proposal, only about 62,270 acres would be managed for "semi-primitive non-motorized" recreational activities. Although demand for these kinds of recreation opportunities is predicted to rise significantly in the planning area, less than 8% of the public lands within the resource area would be managed to provide for the kinds of activities you and I enjoy most, such as backcountry hunting and fishing, hiking, camping, wildlife watching, sightseeing, nature study, and opportunities for solitude in natural environments. A disproportionate amount of land, in excess of 900,000 acres, would be managed for recreational uses which depend primarily on the automobile. Roads and "two tracks" already crisscross most of the entire planning area, but under the Draft RMP proposal, that situation would continue. Over 205,000 acres of public lands would be managed for "roaded natural" activities; approximately 97,000 acres would be managed for "rural opportunities;" and the remainder, more than 603,000 acres, would be managed to provide for semi-primitive motorized activities.

What is most disturbing about the proposal is that the meager amount of land managed for semi-primitive non-motorized use could drop to below 9,500 acres (less than 1% of the public lands within the planning area!) if Congress decides not to designate the WSAs as wilderness. Why? Because the BLM considers the four existing WSAs in the resource area, which combined total 53,851 acres, as being managed for semi-primitive non-motorized activities. However, under the scenario outlined in the Draft RMP, if Congress at some point fails to designate the WSAs as wilderness, those areas which are currently off limits to vehicles would be available for mining, oil and gas leasing and development, roads, and other environmentally disturbing activities. Thus, only 9,130 acres of public lands in the resource area out of a total of 968,000 acres would be managed to provide unroaded recreational opportunities. WSAs should be managed for semi-primitive nonmotorized recreation opportunities even if Congress elects not to designate the WSAs as wilderness.

Greater Protection Needed for Potential National Natural Landmarks

The Grass Creek Resource Area contains several candidate National Natural Landmarks, or NNLs. NNLs are areas identified by the National Park Service as having nationally significant ecological and geological features. The potential NNLs within the resource area include Gooseberry Badlands, almost 30,000 acres of rugged, colorful badland topography dominated by a variety of rock hoodoos, arches, castles, and mushrooms; East Ridge-Fifteen Creek Badlands, 69,000 acres of badlands described in the EIS as "home of the most spectacular in the central Rocky Mountains;" and Tatman Mountain, a gravel-capped mesa where the Greybull River once flowed, which provides an excellent record of Rocky Mountain geologic history. To protect these areas, oil and gas leasing and development and hard rock mining should be prohibited. Scenic resources in NNLs should be protected with a visual resource management classification of "VRM II." Special management plans for these important areas should be developed in consultation with the National Park Service.

More Protection is Needed for Special Recreation Management Areas

500.6

The Draft RMP proposes to establish four Special Recreation Management Areas: the Absaroka Foothills, Ballards, Bighorn River, and Red Canyon Creek. WOC supports the establishment of these SRMAs but believes these areas should be put off limits to oil and gas leasing and development to protect their unique and important values.

The Upper Owl Creek ACEC and Meeteetse Draw Rock Art Area Should be Off Limits to Oil and Gas Leasing and Development

The Federal Land Policy and Management Act (FLPMA) requires the BLM to "give priority to the designation and protection of areas of critical environmental concern." Areas of critical environmental concern, or ACECs, are defined by law as "areas within the public lands where special management attention is required to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes . . . The draft plan proposes these ACECs: Fifteenmile Creek Watershed, Meeteetse Draw Rock Art Area, and Upper Owl Creek. WOC supports the proposal to establish the Fifteenmile Creek, Meeteetse Draw, and Upper Owl Creek ACECs, but encourages you to consider a management alternative that would prohibit oil and gas leasing and mineral development in the Meeteetse Draw Rock Art Area and the Upper Owl Creek. In addition, the recreational and natural resource values of the Fifteenmile Creek Watershed Area should be acknowledged and protected.

The Fifteenmile Creek Watershed, comprising over one-quarter of the entire planning area, has been severely impacted by overgrazing, road development, poor management, and generations of neglect. According to the BLM, only about one-half of all streams and riparian areas within the watershed are functioning properly. In addition, many of the upland areas in the watershed are in fair to poor ecological condition, and remain in a declining trend. Accelerating sediment levels in several streams have caused a significant decline in fish habitat in the Bighorn River, and Fifteenmile Creek has been identified as the largest contributor of sediment to that river. Excessive livestock grazing in riparian areas, more than any other use, is responsible for loss of streamside vegetation and degradation of fish and wildlife habitat. The objective of the proposed 274,300-acre ACEC is to reverse the declining watershed conditions and improve water quality and fish and wildlife habitat by restoring native grass and shrub communities, closing and reclaiming heavily eroded and washed out roads, improving management of livestock and wild horses, and by better monitoring.

Although we support the proposed management objectives for all the ACECs, we are concerned that when management action is taken to achieve the objective of the Fifteenmile Creek ACEC, damage could occur to other important values and resources in that ACEC. For example, constructing concrete barriers to control erosion and sedimentation could impact the area's naturalness. Consideration to this issue should be given.

500.7

The Meeteetse Draw Rock Art Area encompasses approximately 6,800 acres of public lands in the southern portion of the resource area near the confluence of the Bighorn River and South Fork of Owl Creek. The Meeteetse Draw area contains a very large number of meetinge wheels, vision quest structures, stone circles, ancient petroglyphs, and other evidence of extended occupation of the area by aboriginal peoples. Many of the sites within the rock art area have traditional cultural value and spiritual significance to Native Americans including the Northern Arapaho, Crow, and Shoshone tribes. Several sites have been determined eligible for listing on the National Register of Historic Places. The proposed ACEC, accompanied by mineral withdrawals and surface disturbance restrictions, would provide permanent protection for this unique resource.

The proposed Upper Owl Creek ACEC covers some 17,100 acres of public lands in the southern Absaroka Mountain foothills. An important component of the Greater Yellowstone Ecosystem, the Upper Owl Creek borders the Shoshone National Forest's Washakie Wilderness and the Owl Creek mountains. With elevations ranging from 7,200 feet to over 11,300 feet above sea level, the Upper Owl Creek Area encompasses several different landscapes, and provides habitat for incredible array of plant and animal species. The area's inaccessibility, topography, and vegetative diversity make it ideal habitat for a number of sensitive plant and animal species.

The South Fork of Owl Creek Should be Protected

WOC does not agree with your determination that the South Fork of Owl Creek is "not eligible" for inclusion in the National Wild and Scenic Rivers System. To the contrary, the South Fork of Owl Creek is an outstanding river resource undeniably entitled to legal protection as a Wild and Scenic River. We also recognize, however, that there are substantial political and legislatal barriers that impede such designation. But that does not mean the South Fork should not be protected. In this instance, the BLM can and should implement through the planning process protective measures designed to protect the South Fork from development threats. We recommend that the South Fork of Owl Creek and its corridor (1/2 mile on either side) be placed off limits to water development and hydroelectric projects, and to oil and gas leasing, roads, and hard rock and leasable mineral development. This can be achieved without Congressional action through the planning process.

Hard Rock Mineral Withdrawals Should be Sought

Most of the West, including the Grass Creek Resource Area, is open to "hard rock" mineral development (e.g., gold, silver, titanium, lead, uranium, bentonite) under the Mining Law of 1872. This antiquated law allows anyone who has staked a mining claim and made a discovery of a valuable mineral to apply to the United States government for a patent, the equivalent of complete ownership of the land. If a claimant can demonstrate the existence of a locatable mineral in commercial quantities, the 1872 law requires the government to sell the public lands—and the minerals underneath—to the person or, more typically, multinational corporation, for no more

500.8

than $5.00 per acre. Because Congress failed at its most recent attempt to reform this law, it still applies on the majority of public lands in the West.

The Draft RMP proposes closing a few areas in the Grass Creek Resource Area to mining and mineral entry under the Mining Law of 1872. Public lands along the Bighorn River, the Legend Rock Petroglyph Site, parts of the proposed Meeteetse Draw Rock Art ACEC, and all of the proposed Upper Owl Creek ACEC would be closed to mineral development. WOC supports the proposal to remove these important areas from mineral entry, but also encourage the BLM to consider extending the proposed mineral withdrawal to the four existing BLM-designated Wilderness Study Areas in the planning area that will be without any protection if Congress decides against designation.

The Wild Horse Management Plan is a Necessary Response to On-the-Ground Conditions

WOC supports the proposal to expand the Fifteenmile Wild Horse Herd Management Area. Wild horses have roamed much of the resource area since the late 1880s. With the passage of the Wild Horse and Burro Act of 1971, a portion of the natural range was established as a herd management area. Because wild horses (even well-behaving ones) do not recognize administrative boundaries, the preferred alternative proposes to expand the 83,000-acre Fifteenmile Wild Horse Herd Management Area by about 31,000 acres. The boundary change simply reflects historic and actual use of the area by free-roaming wild horses.

Riparian Areas and Rangeland Need Greater Protection

More emphasis needs to be placed on restoring degraded wetland, riparian areas and rangeland. According to the EIS, only about one-half of all riparian habitat within the resource area is considered "properly functioning," and this situation is unfortunately expected to remain relatively static during the entire 10-15 year planning period. Even under the "preferred alternative," the amount of riparian habitat considered to be properly functioning would increase only slightly, from 1,140 acres to 1,300 acres by the year 2015. The BLM should focus more attention and resources on riparian restoration and on identifying and preventing sources of riparian degradation.

Similarly, a large portion of the rangeland in the resource area is degraded and unhealthy, damaged by years of overgrazing and abuse. Although grazing practices and management have improved dramatically during the past few years, many grazing allotments remain in unsatisfactory condition. A more aggressive use of coordinated range management techniques coupled with time-controlled grazing practices would greatly improve ecosystem health and biodiversity.

Greater Emphasis Should be Placed on Fish and Wildlife Habitat

500.9

The proposed resource plan would provide suitable habitat and forage required to support wildlife populations set by the Wyoming Game and Fish Department's strategic plan only "to the extent possible." In addition, the plan would maintain or enhance fish and wildlife habitat, promote species diversity, and allow the expansion of wildlife and fish only "where appropriate." These 'weasel words' don't really mean much, so what is the point of using them, other than to provide an escape hatch for the agency. The BLM is either going to provide for wildlife or not — you should not equivocate on such an important and valuable resource.

WOC supports the wildlife prescriptions in Alternative C, the only alternative that would meet WGFD wildlife objectives and "allow[s] the expansion of wildlife and fish into high potential habitats." Alternative C is also the only alternative that provides adequate protection for all big game winter range. The proposed plan only protects "crucial" winter range for elk, mule deer, moose, bighorn sheep, and antelope.

The BLM Must Stop Thinking of Forests Merely as Tree Farms and Begin to Recognize and Manage for Their Intrinsic Value.

The RMP makes the biologically-bankrupt statement on page 14 that "BLM-administered forestlands . . . need to be harvested over time to maintain a healthy, vigorous forest. Really? The answer to improving forest health is to cut down the forest? The notion that active "vegetative treatment" is needed to maintain a healthy, functioning forest ecosystem is not only absurd, but is belied by both the facts and history. Forests thrived for thousands of years before the advent of chain saws. How did our forests manage to do so well without modern silvicultural practices? Today, there are fortunately thousands of acres of forest protected by wilderness designation. These forests are fully-functioning ecosystems supporting a tremendous array of plant and animal species, despite the lack of active management. And they are unhealthy? If BLM is proposing to develop a publicly-owned tree farm on the Grass Creek Resource Area, which does require active management, it should so inform the public.

Despite the express recognition that the "preferred alternative" would accelerate fragmentation of elk and deer habitat in some areas, the plan proposes to maintain timber harvesting at historic high levels by entering areas that have experienced relatively little timber harvest activity. The draft plan proposes to cut about 6 million board feet of commercial timber from public lands, in addition to 30 million board feet from private and state lands in the planning area. As much as 1,500 acres of public land would be impacted by timber harvest and other forest "treatments" during the planning period. The preferred alternative proposes at least 15 miles of new or upgraded roads, with each new mile reducing effective wildlife habitat by 320 acres. Under the proposal, harvesting of "old growth" would continue until only about 10% of the original forest remains unaltered.

In order to meet sustained-yield objectives, far less timber should be cut from the public lands during the planning period. Because large amounts of timber are being cut on private and state lands within the resource area, the BLM may have to reduce timber

500.10

volumes even further in order to compensate for the loss of wildlife habitat resulting from private and state land sales. The BLM should prohibit commercial timber harvests in the Upper Owl Creek ACEC unless cutting can be proven to improve and enhance wildlife habitat. At least 30% of the forest should be managed as old growth in order to provide suitable habitat for old growth dependent species, such as the northern goshawk, marten, and three-toed woodpecker. The BLM should adopt a "no net gain" policy for roads so that for every new road created an equivalent amount is obliterated (not merely closed) and reclaimed. Roads should not be constructed on slopes in excess of 20%, in wetlands and riparian areas, or on erosive soils, and road closures need to be strictly enforced.

Additional Alternatives are Needed, and a Clarification of NEPA Responsibilities

In order to comply with the National Environmental Policy Act ("NEPA"), new alternatives prohibiting oil and gas leasing and development in ACECs, WSAs, and SRMAs needs to be developed. As it exists now, every alternative in the Draft Plan allows oil and gas leasing on every available acre of land in the resource area. Additional alternatives need to be developed for the management of wilderness study areas that are not designated by Congress, and for the management of visual and forest resources.

At what point does BLM consider the "no action" alternative for individual oil and gas lease offerings on public lands, and how is the public involved in this decision? Although the RMP (page 14) indicates that following the planning area to gas and oil leasing was considered to resolve conflicts with other resource uses, such consideration (i.e., on a planning level) does not satisfy your obligation under NEPA to consider the no action alternative for each lease decision.

Environmental Consequences

Discussion of environmental consequences is a basic requirement of NEPA. This section should describe the environmental impacts likely to result from implementation of the selected alternative. The discussion should also facilitate a comparison of the alternatives described in the EIS. In the case of the Grass Creek RMP, it does neither. Rather than describing environmental effects, the EIS's focus appears to be describing how measures taken to protect the environment (i.e., a no surface occupancy stipulation on a oil and gas lease) might interfere with management actions.

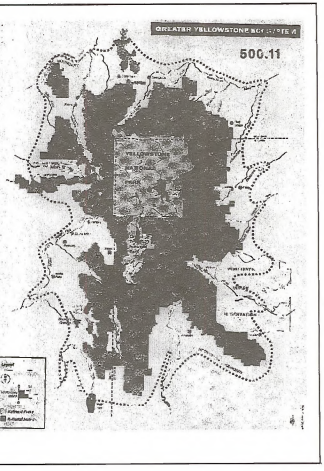
Thank you for the opportunity to comment. Please let us know of any additional comment opportunities and the availability of the Final or Supplemental Draft EISs.

Sincerely,

Dan Heilig

Dan Heilig
Associate Director

500.11



500.12

WYOMING OUTDOOR COUNCIL

April 14, 1992

Joseph T. Vessels
Grass Creek Area Manager
P.O. Box 119
Worland, Wyoming

RE: Grass Creek Resource Area Resource Management Plan -- Planning criteria

Dear Mr. Vessels:

The following comments are provided on behalf of the Wyoming Outdoor Council (WOC) in response to your invitation for assistance in developing planning criteria for the forthcoming Grass Creek Resource Management Plan (RMP).

WOC is a grass roots conservation organization dedicated to the protection and enhancement of Wyoming's environment. WOC achieves its mission by educating and involving its members and the public in agency decisionmaking and by advocating environmentally sound public policies.

I. ALTERNATIVES

In your March 4, 1992 letter requesting assistance in developing planning criteria for the Grass Creek RMP, you state that the "[p]lanning criteria will be used to guide the formulation and evaluation of alternatives, including the analysis of the environmental consequences of the alternatives."

WOC previously transmitted comments to you which addressed, among other things, alternatives to oil and gas leasing on federal lands within the Grass Creek Area. See letter from Dan Heilig, Associate Director, WOC, to Joseph Vessels, Grass Creek Area Manager, dated January 7, 1992. Those comments are responsive to the concerns you raise in the planning criteria letter and are therefore incorporated by reference herein. In our previous comments, we expressed our concern about the manner in which the BLM perceives its responsibilities under the Federal Land Policy and Management Act (FLPMA); namely, that the BLM appears to routinely elevate oil and gas development over other resource values, such as wildlife, recreation, scientific, and natural scenic values. To support that claim, we cited a number of RMPs in Wyoming which authorize oil and gas activities on all of the lands in the planning area (including those lands outside WSAs) under the respective resource management plans. The Cody, Washakie, Great Divide, Lander, Pinedale, and Kemmerer RMPs, for example, authorize oil and gas activities on nearly all legally available lands within their respective planning areas.

701 Main Lander, Wyoming 82520 (307) 332-7531

500.13

The Congress has stated that "management [of the public lands] be on the basis of multiple use and sustained yield, unless otherwise specified by law." FLPMA, 43 U.S.C. 1701(a)(7), 1732(a). Multiple use does not mean oil and gas development at the expense of other resource values. Multiple use does mean "a combination of balanced and diverse resource uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values . . ." See 43 U.S.C. 1702(c). The doctrine of multiple use contemplates "making the most judicious use of the land for some or all of these resources . . ." Id.

In accordance with the above, we strongly urge the development of a wide range of alternatives that accurately reflect the multiple use policies of FLPMA. Certain areas possessing special or unique resource values should be closed to oil and gas development; other areas may be adequately protected by the use of stringent surface disturbance restrictions. (Please see our January 3, 1992, comments for specific recommendations). The alternatives should identify areas open to development subject to standard lease terms and conditions, areas open to leasing subject to restrictive stipulations, such as timing or seasonal use, areas open subject to no-surface-occupancy stipulations, and areas closed to leasing. See BLM Supplemental Program Guidance (SPG) 1624.21 and attachment illustrating Shoshone National Forest Oil and Gas EIS preliminary alternatives.

The consideration of alternatives is the heart of environmental analysis under NEPA. Regulations developed by the the President's Council on Environmental Quality (CEQ) require all federal agencies preparing EISs to "rigorously explore and objectively evaluate all reasonable alternatives . . . and devote substantial treatment to each alternative . . ." See 40 CFR 1502(2)(d). Indeed, the BLM's own planning regulations provide that "[a]ll reasonable alternatives shall be considered and several complete alternatives developed for detailed study." See 43 CFR 1610.4-2. Alternatives that close areas within the Grass Creek Resource Area containing special and/or unique resource values are without question reasonable and must, therefore, be considered in the planning document.

II. ENVIRONMENTAL CONSEQUENCES

a. Resource values. In your March 4th planning criteria letter, you state that the "[e]ffects of surface-disturbing land

500.14

Vessels, Page 3

uses and other human activities on air quality, cultural resources, recreational opportunities, watershed, and wildlife resources" will be addressed in the analysis of environmental consequences in the Grass Creek RMP. Why are a number of important resource values left out of the draft planning criteria letter? As "the Nation's principal conservation agency" WOC believes that the BLM must consider the following additional resource values in the environmental consequences section of the RMP: (1) scenic and visual resources, (2) fisheries, (3) hazardous wastes, (4) geology, (5) soils, (6) vegetation, (7) timber management, (8) wild horses, (9) wetlands and riparian areas, (10) water resources including groundwater, (11) geothermal resources, (12) Native American Indian concerns, and (13) socioeconomic impacts. Indeed, the majority of these resource values are expressly considered in section 103 of FLPMA and all are explicitly analyzed in many other RMP's in Wyoming. See, e.g., Cody RMP/EIS at pp. 77-93.

b. Cumulative impacts. Given BLM's increasing reliance on land use plans to support leasing and development decisions, we believe that the BLM must do a more thorough job of analyzing the cumulative impacts of the proposed action and alternatives. In a recent report, the General Accounting Office (GAO) found that "[m]ost BLM and Forest Service land use plans and related environmental studies for resource areas and forests with high oil and gas potential do not contain adequate information necessary to make informed decisions about the environmental impacts of oil and gas leasing and development." See General Accounting Office, Federal Land Management: "Better Oil and Gas Information Needed to Support Land Use Decisions" (June 1990) at p. 34. The report identified five "key" elements required by NEPA and BLM regulations (including BLM's supplemental program guidance (SPG)) as essential for the agencies to assess the environmental impacts of oil and gas development in resource areas with high oil and gas potential. The elements are (1) oil and gas potential, (2) reasonably foreseeable development scenarios, (3) indirect impacts, (4) cumulative impacts and, (5) lease stipulations. The GAO was especially critical of the BLM's failure to adequately analyze the cumulative impacts of oil and gas activities. For example, of the 40 RMPs reviewed by the GAO, only 7 specifically referred to the term "cumulative impact."

To comply with both NEPA and BLM's SPG, the RMP/EIS must analyze in detail the cumulative impacts of reasonable foreseeable development scenarios. Cumulative impact means "the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (federal or non-Federal) or person undertakes such actions.

500.15

Vessels, Page 4

Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." See 40 CFR 1508.7.

Thank you for providing this opportunity to comment. Please keep me informed of additional comment opportunities related to the Grass Creek RMP; WOC's members have expressed their interest in the development of this RMP, and a desire to see more of the Grass Creek area protected from damaging oil and gas development activities.

Sincerely,

Dan Heilig
Associate Director

500.16

WYOMING OUTDOOR COUNCIL

January 3, 1992

Joseph E. Vessels
Grass Creek Area Manager
Bureau of Land Management
P.O. Box 119
Worland, Wyoming 82401

RE: Scoping Notice - Grass Creek Resource Area Resource Management Plan.

Dear Mr. Vessels:

Thank you for inviting the Wyoming Outdoor Council to participate in the development of a resource management plan for the Bureau of Land Management's Grass Creek Resource Area.

WOC appreciates the amount of effort and resources that the BLM must devote in the development of a resource management plan (RMP), therefore, we have attempted to address a few issues which merit careful consideration in the early stages of plan development. In addition, I discuss issues surrounding oil and gas leasing in some detail in an effort to be responsive to your request for comments concerning mineral leasing, exploration, and development on the Grass Creek Resource Area. I hope you time our comments useful.

I. Alternatives for Oil and Gas Leasing

We understand from your November 25, 1991 letter inviting comments that the alternatives to be considered in the RMP will be identified in the "planning criteria" stage of the planning process and that comments with respect to alternatives will be requested when the planning criteria are developed. We look forward to providing additional comments addressing this issue when a specific request is made. We would ask, however, that you begin thinking about considering in the Draft EIS/RMP alternatives for oil and gas leasing in the Grass Creek Resource Area that would come closer to satisfying the multiple use objectives mandated by the Federal Land Policy and Management Act (FLPMA), 43

201 Main Lander, Wyoming 82520 (307) 332-7031

500.17

U.S.C. 1701 et seq. and the express requirements of the National Environmental Policy Act (NEPA) 42 U.S.C. 4321 et seq.

a) The BLM is not meeting FLPMA's multiple use goals. The Congress has stated that "management [of the public lands] be on the basis of multiple use and sustained yield unless otherwise specified by law." 43 U.S.C. 1701(a)(7), 1702(a). Multiple use, as defined in FLPMA,

> means the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people; making the most judicious use of the land for some or all of these resources or related services over areas large enough to provide sufficient latitude for periodic adjustments in use to conform to changing needs and conditions; the use of some land for less than all of the resources; a combination of balanced and diverse resources uses that takes into account the long-term needs of future generations for renewable and nonrenewable resources, including, but not limited to, recreation, range, timber, minerals, watershed, wildlife and fish, and natural scenic, scientific and historical values; and harmonious and coordinated management of the various resources without permanent impairment of the productivity of the land and the quality of the environment with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output.

43 U.S.C. 1702(c).

It is clear to us, however, that the BLM in Wyoming habitually violates FLPMA's multiple use objectives by placing undue emphasis on oil and gas development at the expense of other legitimate multiple use activities on the public lands. For example, oil and gas leasing is authorized on ninety-nine per cent (99%) of the Washakie Resource Area with surface disturbing activities permitted on a full ninety-three percent (93%) of the federal mineral estate. Washakie Resource Management Plan Final EIS at 3. Similarly, the entire Great Divide Resource Area is available for oil and gas leasing. Great Divide Resource Area Resource Management Plan Final EIS at 52, and all but one per cent (1%) of the 2.7 million acres of federal mineral estate within the Lander Resource Area is available for oil and gas leasing. Lander Resource Area Resource Management Plan at 364. In the Washakie and Great Divide Resource Area RMPs, the BLM attempts to justify the inordinate amount of land available for oil and gas leasing by citing FLPMA's multiple use

mandate. See, eg., Great Divide Resource Area RMP/Final EIS at 32 and Washakie RMP/Final EIS at 111.

WOC disagrees with the BLM's assertion that FLPMA mandates oil and gas leasing on all (or substantial) portions of BLM-administered lands. In fact, FLPMA clearly does not require oil and gas leasing on the public lands. The Act merely recognizes that mineral development is but one of many authorized uses of public lands and their resources. As quoted above, FLPMA requires "a combination of balanced and diverse resource uses" and "judicious use of the land for some or all of these resources" and finally, consideration of "the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." Oil and gas leasing and development on an entire resource area is certainly not balanced, nor can it reasonably be claimed to be a judicious use of public resources, given the deleterious impacts to the environment caused by this activity. Oil and gas leasing, may provide the greatest economic return, but FLPMA directs agencies to consider the relative values of other resources, such as wildlife and fish, recreation, cultural and historic, air, water, ecological, scientific and scenic. 43 U.S.C. 1701(c), 1701(a)(8). Thus, while management for resource utilization is one major goal, the definition of multiple use clearly contemplates conservation-oriented management on appropriate areas of the public lands. We urge you to reconsider your obligations under FLPMA taking into account what has been said above.

Accordingly, we ask that you carefully consider a range of alternatives in the forthcoming RMP/EIS which would propose withdrawals or deny oil and gas leasing for all (or a combination of) the following areas:

* rare, threatened, endangered, and candidate species habitat
* areas of critical environmental concern
* wilderness study areas (including "citizens' proposal")
* steep (15% gradient) and unstable slopes
* crucial wildlife winter range areas
* important wildlife winter range, calving, and breeding areas, migration routes, and summer concentration areas
* floodplains, wetlands and riparian areas
* high soil and water (including groundwater) hazard areas
* municipal watersheds
* sage grouse leks and habitat

* fisheries
* developed and dispersed camp sites
* popular travel corridors, routes and trails
* Native American spiritual sites
* sites listed, or eligible for listing, under the National Historic Preservation Act
* raptor concentration areas
* special management areas
* Class I and II visual resource management areas
* other areas where oil and gas development would not be compatible with existing or foreseeable resource values and uses.

b) The BLM must analyze a full range of alternatives. The consideration of alternatives is the heart of environmental analysis under NEPA. Section 102(2)(E) of NEPA requires agencies to "study, develop, and describe appropriate alternatives to recommended courses of action in any proposal which involves unresolved conflicts concerning alternative uses of available resources." See also, 40 CFR 1507.2(d). In the alternatives section, the agency must "[r]igorously explore and objectively evaluate all reasonable alternatives . . . and [d]evote substantial treatment to each alternative . . ." Id.

The regulations promulgated by the Council on Environmental Quality (CEQ) implementing NEPA direct federal agencies "to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." 40 CFR 1500.2(e). The discussion of alternatives in an environmental analysis document "should present the environmental impacts of the proposal and the alternatives in comparative form, thus sharply defining the issues and providing a clear basis for choice among options by the decisionmaker and the public." 1502.14. In particular, we encourage you to analyze and include a discussion of the "conservation potential of various alternatives and mitigation measures." 40 CFR 1502.16(e).

In sum, WOC urges you to "rigorously explore and objectively evaluate all reasonable alternatives" with respect to oil and gas leasing on the Grass Creek Resource Area. This analysis must clearly include alternatives that propose withdrawing and/or denying leasing for the areas enumerated above.

II. Compliance with FLPMA

a) The BLM can achieve FLPMA's multiple use and sustained yield goals. Section 202 of FLPMA directs the Secretary to "use and observe the principals of multiple use and sustained yield" in the development of land use plans. 43 U.S.C. 1712(b)(1). We are deeply concerned that this mandate is not being met on much of the BLM-administered public lands in Wyoming. We hope that with the development of the Grass Creek Resource Area RMP, action can be taken to bring BLM management activity into conformance with the policy embodied in FLPMA.

The RMP must provide for "the achievement and maintenance in perpetuity" a high-level output of renewable resources of the public lands. It must meet the "present and future needs of the American people" and "take into account the long-term needs of future generations for renewable and nonrenewable resources." 1702(c). All too often, it seems, "the long-term needs of future generations" are ignored in the planning and management decisions for the public lands.

We offer the following recommendations:

1) The BLM can help achieve the multiple use objectives mandated by FLPMA by properly utilizing ACEC designations . ACECs, or areas of critical environmental concern, are

> areas within the public lands where special management attention is required (when such areas are developed or used or where no development is required) to protect and prevent irreparable damage to important historic, cultural, or scenic values, fish and wildlife resources or other natural systems or processes, or to protect life and safety from natural hazards.

43 U.S.C. 1702 (a).

FLPMA requires the Secretary, in the development of land use plans, to "give priority to the designation and protection of areas of critical environmental concern." 1712(c)(3). WOC encourages the use of the ACEC designation to further the multiple use mandates embodied in FLPMA and will support efforts to protect such areas. Proposed ACECs should be identified in the Draft RMP and plans promptly developed "for the protection of public land areas of critical environmental concern." FLPMA, 43 U.S.C. 1701(a)(11).

2) Section 202 of FLPMA directs the Secretary in the development of land use plans to "weigh long-term benefits to the public against short-term benefits." 43 U.S.C. 1712(c)(7). We ask that you consider and include in the Draft Grass Creek Resource Area RMP/EIS a discussion addressing this important requirement. A discussion of this issue necessarily entails consideration of "present and potential uses" of the public lands." 1712(c)(3).

For example, while WOC members recognize that oil and gas leasing is a legitimate use of the public lands, few see any long-term benefits (other than revenue generation) to be derived from increased oil and gas exploration, development, and production activities on the public lands, particularly in sensitive areas. This is especially true when "full field" development takes place on or near areas that have special or unique values, such as habitat for endangered species, sensitive watersheds, important cultural or historic sites, to name a few. Typically, oil and gas development occurs at the expense of other values, some irreplaceable.

We would be interested in hearing, from the perspective of the BLM, what the long term benefits of oil and gas leasing are when development of that resource so often causes irreparable damage to wildlife and wildlife habitat, soil, air and water quality, visual and scenic resources, recreation opportunities, etc? The same question can (and probably should) be asked with respect to timbering, grazing, recreation, and other potentially damaging uses on BLM-administered public land.

3) Section 102 of FLPMA the Congress declares it is the policy of the United States that

> the public lands be managed in a manner that will protect the quality of scientific, scenic, historical, ecological, environmental, air and atmospheric, water resource, and archaeological values; that, where appropriate, will preserve and protect certain public lands in their natural condition; that will provide food and habitat for fish and wildlife and domestic domestic animals; and that will provide for outdoor recreation and human occupancy and use.

43 U.S.C. 1701(a)(8).

WOC urges you to develop a resource management plan which implements the policy set forth in section 102 of FLPMA.

500.22

4) Section 202(c)(6) of FLPMA directs the Secretary to "consider the relative scarcity of the values involved and the availability of alternative means (including recycling) and sites for realization of those values." 1712(c)(6). This section is related to NEPA requirement to "[i]dentify methods and procedures required by sec. 102(2)(B) to insure that presently unquantified environmental amenities and values may be given appropriate consideration." 40 CFR 1507.2.

WOC urges you to give thoughtful and appropriate consideration to "presently unquantified environmental amenities and values" on the Grass Creek Resource Area, including, but not limited to, scenic vistas, clean air and water, wildlife viewing, quiet solitude, semi-primitive recreational opportunities, non-designated "de facto" wilderness, and benefits derived therefrom, and lack of noticeable presence of men and his impacts. These amenities and values, many of which are scarce, are unique to the sparsely populated western states. These and other "presently unquantified environmental amenities and values" do exist outside of BLM designated wilderness areas and must be taken into account during the development and implementation of the Grass Creek RMP.

III. Mineral Development and Oil and Gas Leasing

The potential environmental impacts of current and foreseeable mineral development must be specifically and thoroughly addressed in the Grass Creek Resource Area RMP/EIS.

The issuance of an oil and gas lease without a no-surface-occupancy stipulation (NSO) constitutes an irretrievable commitment of resources requiring the preparation of a detailed environmental impact statement. See, e.g., Sierra Club v. Peterson, 717 F.2d 1409 (D.C. Circuit 1983). This is so because the lease confers upon its holder an irrevocable right to explore, develop, and produce, by means involving surface disturbing activities, the mineral resource somewhere on the lease tract. With few exceptions (e.g., protection of endangered species under the Endangered Species Act), the government is powerless to prevent surface disturbing activities once a lease containing no NSO stipulations is issued. Therefore, a detailed environmental analysis must take place at the lease issuance stage to ensure "that environmental information is available to public officials and citizens before decisions are made and before actions are taken." 40 CFR 1500.1(b). Detailed site-specific analysis conducted during activity planning is clearly not adequate to assess and prevent environmental damage.

500.23
8

IV. Cumulative Impacts

NEPA requires analysis of the cumulative impacts of actions (management goals and direction) prescribed by the RMP. "Cumulative impact is the impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions regardless of what agency (Federal or non-Federal) or person undertakes such other such actions." 40 CFR 1508.7 "Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time." Id.

Oil and gas leasing, exploration, and development, coal-bed methane development, hard rock mining, utility rights-of-ways, recreation, timber and range management activities, livestock grazing, and fire suppression are illustrative of the types of actions prescribed by BLM resource management plans. The Grass Creek RMP/EIS should assess the incremental environmental impacts of these and other "past, proposed, or reasonably foreseeable future actions" within the resource area.

V. Water Resources

a) Wetlands. The RMP should indicate the location of wetlands in the resource area and identify the functions and values of wetlands potentially impacted by development scenarios under each of the alternatives. Wetland maps are available from the U.S. Fish and Wildlife Service as a result of that agency's National Wetland Inventory (NWI).

The RMP should indicate that the discharge of fill material into wetlands and waters of the United States is regulated by Section 404 of the Clean Water Act, 33 U.S.C. 1344. The RMP should also note the existence of and compliance with Executive Order 11990.

b) Groundwater resources. Management actions, particularly hard rock mining, coal mining, and oil and gas development can have a harmful and irreparable impact on groundwater resources. The RMP should include a discussion of the potential impacts on groundwater resources (including disposal of produced water) of various development scenarios and methods available to mitigate - and monitor - such impacts, and criteria used to select such methods.

500.24
9

State of Wyoming groundwater classifications (existing and potential) for aquifers underlying the Grass Creek Resource Area should be identified in the RMP and management activities conducted in accordance with applicable state classifications. In addition, aquifer data should be included in the RMP.

c) Surface water resources

The RMP should include a discussion of the potential impacts on surface water resources as a result of various development scenarios prescribed by the RMP. Methods available to mitigate - and monitor - such impacts, and criteria used to select such methods, should be discussed. Current and potential surface water classifications (federal and state) should be identified and statutory and regulatory framework providing protection for Wyoming's surface water explained. Please include in the RMP a discussion of how water quality data is collected and analyzed.

VI. Visual Resources

Proper and appropriate classification of visual resources on the Grass Creek Area is essential to carry out the multiple use mandate of FLPMA. WOC believes visual resources are extremely valuable and frequently underrated in BLM management of the public lands. In addition, our members have often found that efforts to mitigate impacts to visual resources on BLM-administered lands, including Wyoming BLM Standard Oil and Gas Lease Stipulations and other mitigations developed during site-specific environmental analyses, are woefully inadequate. We hope the Draft RMP/EIS includes a discussion of the methods employed by the BLM to identify and evaluate visual resources. The rational for proposed VRM classifications should also be explained and supportable.

VII. Statutes, Regulations, Planning and Environmental Analysis Documents

Please include in the Grass Creek RMP/EIS a brief discussion of applicable laws, regulations, planning and environmental analyses documents that influence management direction and actions within the Grass Creek Area. Comments addressing this issue can assist the public in understanding the basis and need for certain activities on BLM-administered public lands.

500.25
10

The Grass Creek Resource Area RMP should include a discussion of the "means to mitigate adverse environmental impacts" (40 CFR 1502.14(h), 1502.16(h) and monitoring should be incorporated into the Record of Decision. 40 CFR 1505.2, 1505.3.

IX. Incomplete or Unavailable Information

We are disappointed that the BLM "will conduct very little new inventory work for the Grass Creek RMP[but will rely upon existing, available resource information and data." Scoping Notice (November 25, 1991). We sincerely hope that you can "insure the professional integrity, including scientific integrity, of the discussions and analyses" (40 CFR 1502.24 - Methodology and scientific accuracy) in the Grass Creek RMP/EIS without the benefit of additional inventory work and information. WOC would suggest a review of CEQ section 1502.22 - Incomplete or unavailable information - prior to the preparation of the Draft EIS. We also recommend consultation with the Wyoming Nature Conservancy, located here in Lander, and the Greater Yellowstone Coalition, in Bozeman, MT.

You indicate that "existing, available resource information and data" will be be relied upon. What information, specifically, will be used? Have you consulted other federal, state, and local agencies in an effort to obtain current and reliable information?

X. Tiering and Incorporation by Reference

Tiering (40 CFR 1502.20, 1508.28) and incorporation by reference (1502.21) may be used to reduce paperwork and eliminate repetitive discussions of the same issues in the environmental document. We encourage the use of these practices.

WOC appreciates the opportunity to offer our comments. Please do not hesitate to call me if you have questions or thoughts on the issues discussed herein. I look forward to participating further in the development of the Grass Creek RMP.

Sincerely,

Dan Heilig
Associate Director

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

501

May 6, 1995

Bob Ross
Bureau of Land Management
Box 119
Worland, WY 82401

RE: Grass Creek Resource Management Plan

Dear Mr. Ross,

I believe the Grass Creek RMP is a fairly sound document. My only concerns are the provisions on off road vehicle travel and whethnr the BLM will follow through with its plans for grazing management in the Resource Area.

The off road vehicle ban will be hard to enforce and except in wet conditions, is not impacting the area at present levels. The retrieval of downed game animals should be allowed, at a minimum.

The grazing provisions in the old RMP were very good and were not followed. I hope the BLM will be able to follow this document better than the last one. The lower allotments in the Basin are generally in worse shape and are getting less attention. These watersheds are impacting the fisheries on the Big Horn River and after years of personal involvement I have not seen much measurable improvement.

Sincerely,

Bruce Caterman

Bruce Caterman

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

502

HOMESTEAD REALTY
506 Broadway • Thermopolis, WY 82443 Ph: 307-864-3243 • Fax: 307-864-2265

May 5, 1995

Worland BLM
Bob Ross, RMP Team Leader
P. O. Box 119
Worland WY 82401

Bob:

Please accept this letter as my comments concerning the "Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement." I oppose the plan for the following reasons:

1) It is not needed time and money have been wasted developing it and more will be spent defending it. You now have the knowledge and regulations to do what you profess this document will allow you to do. In many cases it has end is now being done. The thousands of hours spent writing this plan could have and should have been spent out on the ground actually doing things to improve the range and clean up the environment. Then look at the man hours wasted by the BLM staff spent trying to justify the 2000 pages of data and all the time spent by all of the public trying to decipher what it really says and what you are really trying to accomplish. No doubt after it is finalized we will continue to fight and waste time and other resources trying to determine what it means if it is legal.

2) The "Multiple Use Concept" of public lands has been trashed by this document. The commodity users of the land are not given equipment near equal footing other users, i.e. wildlife, recreation or just no use. Priority uses have been established such as "Wild Horse Areas", "Critical winterring range", "Area of Critical Environmental Concern", "Riparian Habitat", "No Land Areas" and others. These priority uses are not economically defined or proven to be justified but if no designated priority conditions are present, the land is open. Big Horns Estate and retail business as well as ranching in Hot Springs County I know our economy is very fragile. Minor economic impact is expressed in the plan may turn out to not be minor. Many small business are just barely in the black, just a small decrease in gross revenues puts them in the red and eventually out of business. The ripple effect then starts and more and more businesses fall by the wayside. Then tax base and jobs are lost. Many ranches such as mine cannot continue to operate if your goal of 25% reduction in grazing use is even partially attained. Unreasonable restrictions on the Oil and Gas industry will cause tremendously economic hardship in the 4 counties and the state.

502.2

3) wildlife and livestock have co-existed for many years. We do not need to eliminate one to protect the other. There is more game in the Owl Creek Area than at anytime during the 47 years I have lived here. Much of the increase can be contributed to increased feed production on the ranchers private lands. When the Game and Fish personnel came to the landowners and permittees with the idea of reintroducing Mountain Sheep we were assured that there would be no conflict with livestock grazing, but now we hear a different tune. NO SHEEP and REDUCED UTILIZATION BY CATTLE. It's not honest it's not fair and it's not necessary. Mountain Sheep can flourish with cattle and domestic sheep.

4) Much of the data used in the document has questionable accuracy and interpretation. Examples: Table 3-5 appendix 3 has calculations of suitable AUM's that were not allowed in previous resource management plans. Table 3-3 appendix 3 dealing with actual livestock grazing use has many errors as well as indicating that the only reason for previous non-use is because the range could not support the permitted use. Table 3-2 categorization is arbitrary and in many cases inaccurate. Map A vegetation (page 237) is not accurate.

5) The interpretations of this document can and do vary greatly. A justification for almost any decision made can be found somewhere in the plan. In the wrong manager's hands, very general goals combined with less than factual data sure looks like disaster for the commodity users of the public lands.

Last but wordy not least in my mind is the control of my private lands being lost through tighter and more inflexible plans and administration of my grazing permits. Even though federal land use only accounts for 20% to 25% of allotted grazing use 100% control is imposed by the agency in the name of conservation and the public good. This has been the direction taken in all plans and changes made for 20 some years. I really believe my vote and opinion, because of my 40 years of ranching and range management experience plus 72% to 88% ownership of my grazing permits, should be more heavily weighted than the opinion of some John Doe from Kokomo that has very limited knowledge of the situation but that wants to be a do gooder.

Joe Campbell

Joe Campbell

copies: Wyoming Congressional Delegation

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

503

C.A. BENNER RANCH
BOX 238
MEETEETSE, WYOMING 82433

May 6, 1995

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

RE: Grass Creek Resource Area Management Plan DEIS comments

Dear Mr. Ross:

As a permittee in the Grass Creek Resource Area., I wish to make the following comments on the DEIS and in effort to impress upon you the fact that you have not provided viable alternatives under the grazing management section and do not provide adequate justification for the alternatives. Much of the text is vague and therefore left open to interpretation. This is dangerous.

For example, on page 37 under Livestock Grazing Management you state: "Authorized livestock grazing would decrease may be needed in areas with excessive soil erosion, poor vegetative condition, or as necessary to provide forage for wildlife and wild horses, or to improve the visual quality of lands with high recreational value." What is excessive erosion? What is "poor" vegetative condition? How much wildlife and how many wild horses? Grazing is taking second seat to recreational value - this is not acceptable. Why are you closing land tracts along the Bighorn River to livestock grazing?

The proposed ACEC for the Fifteenmile Creek watershed is creating defacto wilderness areas that severely limits commodity use. Why? Have you done a cost/benefit ratio on this proposal? If so have to us that you believe that you can play "God" with the proposed alternatives. The geological make-up of the soils in this area are such that the natural erosion that will take place cannot be stopped. It may be slowed down; but, in reality, this area will never be a grassland- even if you eliminated every cow grazing on the allotments. Why are you so interested in protecting the "wild horses", when they are not truly wild horses? How many acres to they need and at what cost to our local economy?

The conditions for fire management need to be defined. It appears the present plan is based on a 1800 year burn cycle. A fifty year cycle would be much more appropriate. We are already 100 years into the cycle. For example, the critical elk habitat area on Rooster Creek is completely overrun with large sagebrush and shrubs and needs to be burned now.

(2)

503.2

On page 244 of the DEIS in reference to the 05626 Timber Creek allotment you state "the permittee took a 59 percent reduction in grazing preference". This is correct, we are the permittee, and the fact is that the reduction was taken under duress and we still do not agree with these terms.

We disagree with taking "1990" as the base year. A much better approach would have been to take a ten year average to establish the base. What is so special about 1990?

You have not identified the benefits of livestock grazing on the public land in the DEIS. Cutting AUMs on uncertain quantitative data outlined in the DEIS will not benefit the custom and culture and economic base of the area. You allow no flexibility in managing these areas. This is not a black and white issue - you must look at the long range on an individual basis, taking into account the climate (which is not controllable even by the BLM) in a particular year.

Throughout the document you are placing a greater emphasis on recreation and wildlife than grazing. How much income do these uses bring to the federal government? We are not against wildlife and recreation but there needs to be a balance. The BLM does not recognize the split estate that the permittees have in the allotments even though the IRS has seen it appropriate to assess estate taxes on them. When you reduce AUMs you are reducing our ability to make a living and this is a taking of our property and civil rights without just compensation.

Sincerely,

Chris Renner, Vice President
C.A. Renner Ranch

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

504

GOULD RANCH COMPANY
123 PITCHFORK ROAD
MEETEETSE, WYOMING 82433
MAY 3, 1995

Mr. Bob Ross
Team Leader
B.L.M. Box 119
Worland, Wyoming 82401-0119

RE: TIMBER CREEK RESOURCE AREA RESOURCE MANAGEMENT PLAN
DRAFT ENVIRONMENTAL IMPACT STATEMENT

COMMENTS CONCERNING ALLOTMENTS 0564, 2510, AND 2511

Map 4: We request that all three of the above allotments be removed from full suppression area.

Map 11: Limits on Surface Disturbance
Gould Ranch Company requests that no timing limitation be placed on the three allotments.

Map 18: Off Road Vehicle Management
We request ORV use be waived for the on-going ranch management needs.

Map 22: Precipitation Zones
The three allotments must be included in the 10-14" precipitation zone, because actual data clearly shows this.

Table 8 p. 124: Activities Affecting Soils Estimated Acres and Duration of Disturbance
Gould Ranch Co. takes exception with *"5 tons of soil loss per Acre due to livestock grazing.* We strongly assert that planned biological livestock grazing builds soil rather than causing soil erosion.

Table 8 p. 127: Soil Productivity, paragraph 2 states, "Unlike agricultural soils, rangelands are few opportunities to improve the productivity of rangeland soils through the use (of) fertilizers."
This is a blatantly false and unproven statement. Livestock fed a commercially prepared free choice selection of minerals will consume minerals which are deficient in the soil and plants. Through urination and dunging, 50% of the lacking minerals consumed are deposited. Balancing herbivores' mineral needs, the soil becomes renewed and balanced. Holistically, all resources will benefit from a vigorous mineral cycle.

Table 10 p. 129: There's a contradiction between the DEIS's classification of Iron Creek and the Wyoming Game and Fish

---

classification of Iron Creek. Wyoming Game and Fish classification of Iron Creek being a class 3 is more accurate than the class 2 stated by DEIS.

Rangeland Vegetation, p. 132: The term preferred species ("key species") should not be used in the Grass Creek Resource Area's management decisions. All management direction must be through the DPC concept obtained by a well-thought out goal with the DPC having the ability to propagate the site specific area through on-ground evidence.

Reference to Ecological Condition Classes
Throughout the document, ecological condition classes should be omitted due to current scientific evidence from the University of Wyoming, among many, which negates the Clementian theory. Therefore, Table 12 should be removed.

Wild Horses p. 139
Because of the undesirable effect from wild horses upon the resource area, the wild horse herd should be removed from this area. There is a true wild horse herd descendant from the Spanish horse living in the Prior Mountains, which will satisfy the public view for actual wild horses.

Wild Life Big Game p. 139
In this first paragraph, the "limiting factor" is not more habitat, but the proper management of the species. Instead, the most valuable and unowned habitat for wildlife is private property, where wildlife find abundant water and a more palatable forage.

Map 31: Big Horn Sheep & Pronghorn Antelope Habitat
Allotments 0564, 2510, & 2511 must be removed from the Pronghorn Crucial winter range, because they simple do not winter in these allotments.

Map 32: Elk Habitat
Crucial winter range designated in Township 48, Range 100 west should be removed, because it is not crucial.

Map 34: Mule Deer Habitat
Designation of Allotments 0564 & 2510 as crucial winter range for mule deer must be removed, because mule deer don't live in this area at any time of the year.

Map 35: Sage Grouse Habitat & Complexes
Gould Ranch Co. would be willing to work with the BLM to enhance the strutting grounds and the breeding and nesting habitat designated in TAB RIDGE.

Northern Rocky Mountain Grey Wolf p. 150
Why can't one bureaucracy communicate facts with another? It behooves us that the Grey Wolf exists in the Grass Creek Resource Area upon the evidence of this document, while

503.3

another federal agency spends millions "reintroducing" the Grey Wolf. This is highly frustrating to taxpayers with a government in Chapter 11 condition. If the our taxes in it, the document states how the wildlife is going to be food for the Grey Wolf.

Proposed Areas of Critical Environmental Concern p.151
We strongly object to the Fifteen Mile watershed proposed ACEC. If a problem exists, it should be handled through Public Law 566 and Wyoming Statutes pertaining to watershed management.

Rangeland Vegetation p.196
Gould Ranch Co. suggests different classes of livestock be a viable option in controlling noxious weeds.

Socioeconomics p. 193
It is ludicrous that such a tiny portion of this document is devoted to the social and cultural factors. The people who live here depend upon the economic out-put from the federal lands for their well-being. For example, the Meeteetse Area is 86% dependent upon the oil and gas production. Clearly, if this management plan is implemented, our custom and culture will be destroyed. Great chunks of the agricultural and oil & gas industries will be done along with their tax bases.....which support nearly everything conceivable in our area.

Livestock Grazing p. 189
Limiting fire due to sage grouse is backward, since sage grouse don't care for old, decadent sage. Strong evidence indicates that the major decline of sage grouse in the West is due to the massive increase of old, decadent sage brush communities. Limiting fire or other brush control methods eliminates a necessary tool to enhance sage grouse habitat. Sage grouse chicks eat succulent, young and tender forbs and grasses, therefore burning can increase and improve sage grouse habitat.

Appendix 3 p. 235: Components of the Livestock Grazing Management Program
Section 8 of Public Rangeland Improvement Act (PRIA) must be included in this section.

Table 3-2 p. 238: Authorized Grazing Use Information by Allotment
Active Preference AUM's on Little Buffalo Basin Allotment 0564 should be raised to include the 63 suspended AUM's, which were suspended for oil and gas activity. Observation through the years has demonstrated that a well site or road has created significantly more forage than the natural community might have produced. This is due to the fact of water run-off and more heat from the well site or road enabling bordering kochia and other highly productive

504.4

species to produce large amounts of highly palatable and nutritious forage. The disturbance of the oil and gas fields has increased the pounds of production way beyond the suspended 63 AUM's.

Table 3-2 p. 238
Allotment 2510: The Selective Management Category in this allotment should be changed from I to M category, because of the large quantity and quality of established range improvements, the planned biological grazing program utilized by Gould Ranch Co., and future planned improvements. Intensive monitoring obviously reveals that trend and other indicators of range health prove that this allotment no longer belongs in I category.

Table 3-3 Appendix 3
Average Actual Gazing Use by Allotment Season of Use for Allotment 0564 needs to be open to better suit planned biological gazing and weather conditions.

The column designating actual use for the 5-year period of 1987-91 is of no value, because we experienced the most severe drought ever recorded for this area. The same reason is true for the next two columns.

Table 3-3 Average Actual Gazing Use by Allotment
Allotment 02510: The season of use should be open due to Gould Ranch Co.'s planned biological grazing and weather conditions.

Average actual use for the five year period from 1987-91 was the the most severe drought recorded for this area. The same reason applies to the following two columns.

Allotment 2511:
The footnote at the bottom of this table indicates the BLM has no data to support any numbers, therefore there should be no numbers in any of the designated columns.

Table 3-4 Appendix 3 Ecological Condition Class and Acreage of Public Land by Allotment
Allotment 0564: Data presented in this table is inaccurate. The reading by the BLM of the east trend transect in 1992 showed the majority of the pasture to be in "excellent" condition, which is not reflected in the table, that lists the condition as "good".
Allotment 2510: The most recent reading of the allotment in 1992 shows the Grass Creek Resource Area document is erroneous from the actual data collected by the BLM.

Table 3-5 Comparison of Stocking Levels, Actual Use, and Suitability by Allotment
Allotment 0564: Recommended stocking levels as presented in column C is faulty because the data used to arrive at the

504.5

conclusion is not the most recent and accurate data available (1992). The 1992 data clearly indicates this allotment is capable of supporting the grazing preference of 625 AUM's. This document's data, which ceased in 1990 or before is contrary to the 1992 data.

Table 8 Status Report of Completed Allotment Plan Implementation Allotments 0564 & 2510
An AMP was signed by Gould Ranch Co. in 1985, but an updated evaluation of that was signed in 1992, which contains new management methods as well as new goals. The Grass Creek DEIS states the trends were upward in some, but not all areas. A clearer statement should be that the trends are upward in the majority of these allotments, but in the remaining places the trends are static due to climax sage brush dominated communities. This condition was predicted by a technology team from the U. of Wyo. and the BLM in 1985. That report is on file with the BLM.

Gould Ranch Co. requests the final Grass Creek Area Management Plan state the suspended and voluntary non-use AUM's be restored to the allotments referred to in this letter.

Sincerely,

James F. Gould
James F. Gould
Secretary

cc: Wyoming Congressional Delegation
Governor Geringer
Park County Legislative Delegation
Park County Commissioners

505

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

505.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

[redacted]

May 6, 1995

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

506

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, WY 82401-0119

RE: Grass Creek Resource Area Management Plan-DEIS

Dear Mr. Ross:

The Grass Creek Resource Area Management Plan Draft Environmental Impact Statement is a very unique and confusing document. I wonder how many people and hours went into developing this document. It is also interesting to read such statements as the Acting State Director, Robert A. Bennet made in his opening letter."This Draft Environmental Impact Statement for the Grass Creek Resource Management Plan outlines four alternatives for managing the public lands and resources in the Grass Creek Resource Area of the Bureau of Land Management." "These alternatives are designed to resolve resource management issues that were identified with public involvement during the planning process. This document also describes the anticipated environmental consequences of implementing each alternative." I acknowledge that the mission of the document is to maintain, enhance and give direction to the multiple uses of federal lands in the resource area.

I find it somewhat difficult to support the proposed plan when there is so much of it that appears to be very biased toward one facet of multiple use and that is wildlife. Specific concerns have been discussed on a number of occasions with you and your staff and at the various public meetings and hearings, however I would like to add the following:

1. Acting Director Bennet states there are four alternatives when in fact there is about 71% of the alternatives that read "Same as Preferred." This does not in fact provide and alternative if everything is the same!

2. The document provides only minimal information of the economic impact that the Preferred Alternatives will have one the entire resource area. It does not provide information of how many livestock users will be put out of business by the reductions proposed of 25%-35%.

3. The number of contradictory statements that the document contains is very disturbing, such as "No coal is currently mined or leased on BLM-administered public lands in the planning area."(page 114) and yet "Coal production totaled 100,000 short tons in 1990, raising the area's economic activity by over $1.74 million that year. It also supported about eleven full time area jobs. BLM-administered mineral estate lands accounted for approximately one-half of this coal production and the resulting economic impact." (page 123). When in fact the only producing coal mine in the area at that time was a privately owned mine on private lands.

506.2

"In general,resource conditions on public lands in the planning area, including range vegetation, watershed, and wildlife habitat are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced or that would warrant elimination of livestock grazing on the public lands." (page 13) "Grazing use would be adjusted at a constant rate during the analysis period, reaching anticipated levels as activity plans are implemented."(page160). Table 17, page 150, indicates the total authorized grazing as 157,385 aums, preferred alternative 117,762 aums, actual use 1980 130,924 aums, 22 allotments without inventory data 15,952 aums. To me this information certainly indicates that the emphasis over the next 15 years is to reduce and eliminate livestock grazing.

4. The oil & gas industry provides the majority of revenues to this resource area and the proposed No Surface Occupancy or Controlled Surface Uses will have a significant economic impact to the communities and individuals within the area. It seems to me that these designations are not necessary when you cover these leases in your present lease agreements. There must be flexibility or there willnot be further development in the area.

5. The wild horse land expansion proposals should be removed. Why is the herd being expanded from the 1989 levels? It appears that you are taking the easy way out for managing the herd and that is by expanding the herd area. The problems identified in the EIS are similar to those of the present livestock permittee and they do not have the option of expanding their land area to accomodate their livestock. The horses can be managed without the expansion if the effort is put forth. It is not of a cost benefit to build a road into that area for the wild horses that would take place and there would in fact be a greater expense and potential for land abuse if the entire herd was not fenced and monitored to ensure there was no off road travel taking place. The area as described is an area of critical environmental concern and has soils that are highly erodible. Consideration should be given to remove the horses from this area to an area that already has roadways available such as the McCullough Peaks.

6 Comments regarding the Northern Rocky Mountain Grey Wolf should be eliminated from the plan as this area has nothgen designated a part of the wolf recovery area. In fact there should be a predator control plan written and included in the EIS that not only considers the wolf but all other predators as well.

7 It is recommended that your fire limitations of 500 acres per year be reviewed and expanded as this is one of the best range treatment tools available for not only livestock grazing but for wildlife and range conditions.

506.3

8. The timber management plan needs extensive revision and consideration for the timbering of the 86% mature forest be harvested rather than letting the timber rot or develop itself for a major fire and destruction of the usable timber. Selective cutting will provide the removal of usable trees and wildlife habitat.

9. Off Road Vehicle management needs more clearly defined designations along with a specific program for enforcement of violations. The areas of the Absaroke Foothills appear to need additional limitations for the use of off road vechiles. particularly the " 4 wheelers."

10. I cannot determin from the EIS why there is such a need to declare so much of the resource area as an Area of Critical Environmental Concern. This seems to take on the connotation of expanding or developing more wilderness!

Ross, it appears to me that the EIS does not provide a balanced approach to the multiple users, the governmental agencies, communities in the resource area and the public as a whole. Therefore there are a number of changes that need to be considered and incorporated into this EIS prior to it being submitted for final approval. I believe you have received many recommendations, particularly from the various county commissions in the resource area, individual permittees, chairman of the Worland State Grazing Board, that if accepted will provide a more balanced and acceptable plan for all concerned. Please accept these comments for consideration into a modified plan for th resource area.

Respectfully,

James E Hillberry

James E Hillberry
individually and for Tombstone Cattle Co

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND DISTRICT OFFICE

507

John H. Cubbon
[redacted]

May 1, 1995

Bureau of Land Management
C/O Mr. Bob Ross
Worland, WY 82401

Dear Mr. Ross:

I have reviewed the Grass Creek Area Resource Management Plan Draft Environmental Impact Statement and have the following concerns and suggestions for your consideration.

1. I am strongly opposed to expanding the "wild horse" management area. In fact, these "wild horses" are not native species to Wyoming and should not be treated as though they need protection. In contrast, the current "wild horse" (or more correctly, "offspring of once tame horses") management area should be totally eliminated.

2. I am strongly opposed to further restriction to surface use on these lands. Current environmental laws, historic preservation laws, game laws, etc. already adequately protect the lands. Further and redundant regulations are not needed.

3. The value that is placed on recreation is much too high in the Draft EIS. The people of the State of Wyoming depend on these lands not only for recreation, but for a livelihood as well. I should remind you that the BLM is only the renewal or leaseholder of these lands and should view the opinions of the people who live near these lands and who depend on them for their livelihood as more important than those who live in other parts of the country and do not have to deal on a daily basis with the regulations that are put on these lands.

4. Timber Harvesting, Mineral Extraction, and Ranching are not given fair consideration in the Draft EIS. These industries provide much of the tax base to Wyoming and the economic impact to these industries have not been given ample consideration.

5. I strongly object to the use of my tax dollars to build "interpretive sites" and "Nature Trails". This type of development on these lands will not attract additional tourism in this area. These types of projects are "nice" in some areas but are not need in the Grass Creek Area.

507.2

In summary, it appears that the BLM is trying to force the radical environmentalists view of how these lands should be managed (or not managed) on the people of Wyoming without regard or concern for the impact that further regulation of these lands will have on our economy, livelihood, and lifestyle. Instead, the BLM should work with the people of Wyoming to alleviate unnecessary regulatory burdens and to promote development of our natural resources in a reasonable and responsible manner. I personally enjoy the use of BLM administered lands and am grateful that these lands are open to the use of all Americans. However, I do believe that the radical threats to the lifestyle of the people of Wyoming that are outlined in the Draft EIS will strengthen the "states rights" movement and will result in the eventual administration of these lands by the state (of which I would strongly support).

I strongly encourage you to meet with the Timber, Mineral and Mining, Ranching, and Wyoming Tourism industries prior to implementing any new restrictions on this area. Please remember, the commission of the BLM is to manage the land under it's administration, not to dictate and recommend how it should be used; that job must be left up to the state.

Sincerely,

John R. Cubbon

John R. Cubbon

cc: Governor Geringer
Converse County Commissioners

508

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

May 2, 1995

BLM
C/O Bob Ross
Grass Creek Area Draft EIS
P.O. Box 119
Worland, WY 82401-0119
Fax (307) 347-5195

Mr. Ross:

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

508.2

Mr. Bob Ross
May 2, 1995
Page 2

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-footed Ferret inferences.

Duane N. Stanton

Duane N. Stanton

509

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Richard D. Rosencrans
[redacted]

May3, 1995

BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the BLM's noncompliance with its own rules on the GEIS process with regards to accepting form letter comments.

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments. Beneficial impacts of businesses should also be considered.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income, and support our communities through taxes.

I object to the severe and undue number of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology, successes and cooperation of various industry groups, and new methods of mitigating and reclaiming any impacts.

I object to the bias for recreation disturbance and the bias against minerals and grazing.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management. I object to the higher standards to which specific industry groups are held compared to government and the general public.

Sincerely,

Richard D. Rosencrans

510

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Monica L. Rosencrans

May3, 1995

BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the BLM's noncompliance with its own rules on the DEIS process with regards to accepting form letter comments.

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments. Beneficial impacts of businesses should also be considered.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income, and support our communities through taxes.

I object to the severe and undue number of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology, successes and cooperation of various industry groups, and new methods of mitigating and reclaiming any impacts.

I object to the bias for recreation disturbance and the bias against minerals and grazing.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management. I object to the higher standards to which specific industry groups are held compared to government and the general public.

Sincerely,
Monica L. Rosencrans
Monica L. Rosencrans

511

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

William D. Bogg

May 2, 1995

Bureau of Land Management
c/o Mr. Bob Ross
Grass Creek Area Draft RIS
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

I have reviewed the draft RIS recently prepared for the Grass Creek Area and am troubled by a number of proposed changes included in the document. Obviously I have read certain portions more carefully than others but the following should summarize my concerns and objections to the document in its present form.

1) All of the proposed alternatives will cause significant detrimental financial impact to businesses and individuals alike. This in turn will erode the tax base and cause undo hardship on communities and counties already hard pressed to provide needed services (education, social services, fire and police protection, etc.). Therefore, I object to the current alternatives and recommend that a new preferred alternative be created with input from knowledgeable citizens as well as representatives of the affected groups (grazing, recreation, oil/gas and minerals industry, timber and local governments).

2) I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area BMP, not the expansion of such areas. Wild animal management should be controlled by the State Game and Fish and managed animal production by the private sector. Feral horses were not part of the original wild animal population and thus should not be treated as a protected element. While there may be room for some wild horses, the herds should be severely restricted.

3) The current document does not discuss or take into consideration the impacts to the value of private, state and county lands adjacent to or embedded within BLM administered lands. This, in effect, results in a 'takings' which must not be allowed.

4) All of the alternatives propose undoly severe levels of restrictions on surface disturbance. Insufficient emphasis has been placed on new technology and new information for mitigating and reclaiming any impacts. There is also a clear and definite bias for recreation disturbance versus minerals, grazing and other forms of economic activity.

Thank you.
William D. Bogg

512

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Matthew J. Kinkzele

May 2, 1995

BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. I hope someone has the opportunity to read and consider my comments below in detail.

I would first like to object to the significant financial impacts to businesses, individuals (and the resulting negative effect on the tax base),and the affected counties and communities due to restrictions proposed within all of the current alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments. These entities have been all but left out of the process and should be included due to the enormous impact this statement could have on the industry and communities (due to possible substantial tax base losses).

I also find it hard to agree with the expansion of 'Wild Horse Management' areas. I recommend eliminating all 'Wild Horse Management' areas in the Grass Creek area BMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector. The Federal Government has proved time and again its inability to manage effectively and efficiently.

I also disagree to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on all allotments. Targets should be clearly established and stated. The data collection procedures cited for AUM utilization, and suitability should be redone entirely.

Proposed restrictions hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes. These restrictions are not necessary and only show the true character of the radical attitudes that were expressed in the study.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to

512.2

mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation. The statement must have been written by radical environmentalists that have no understanding of effects on the surrounding communities. Other voices must be allowed to have input on the statement. Industry is willing to work out possible problems and come to reasonable compromises. Governmental agencies and environmentalist tend to understand that they must work with industry to come to reasonable solutions, not work against industry and development at all costs.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management and to the small amount of land considered for suburban expansion and to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unadulterated Gray Wolf inferences, and Prairie dog, Black Footed Ferret inferences. Radical environmentalist have wasted tens of hard earned tax dollars, and cause huge unreasonable industry losses to save species that are not truly endangered, or a species that can and have adapted to changes in their environment. More value should be given to the human race.

In conclusion I would like to once again object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should be factored into the study. Thank you for this opportunity for input on this subject.

Sincerely,
Matthew J. Kinkzele

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

513

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

513.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

John B. Woods

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

514

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

514.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Kelly L. Kintzele

515

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current privary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

515.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

516

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current privary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

516.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

517

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

517.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Debra E. Kousaulos

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

518

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

518.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Donna K Sandry

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

519

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

519.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Kelly L. Sandy

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WYOMING STATE OFFICE

520

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

520.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

B.L. Clemm 5/4/95

521

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BOISE, IDAHO DISTRICT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland WY 82401-0119
FAX (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed Animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered Lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

521.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

522

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BOISE, IDAHO DISTRICT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland WY 82401-0119
FAX (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed Animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered Lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

522.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

523

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-4195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area HMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

523.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

524

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-4195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area HMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

524.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

525

To BLM C/O Bob Roes
Grass Creek Area Draft RIS
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

525.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

526

To BLM C/O Bob Roes
Grass Creek Area Draft RIS
P.O Box 119
Worland WY 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the affected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

526.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

527

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

527.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Richard A. Simpson

528

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

528.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Grey Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

John A. Mitchell

529

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

To BLM C/O Rob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and mineral industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off Road Vehicle Management.

529.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Robert Kopp

530

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BIG HORN, WYOMING

To BLM C/O Rob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and mineral industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

530.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Dan R Knopff

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

531

To BLM C/O Bob Ross
Grass Creek Area Draft SIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-5139

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

531.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Pooted Ferret inferences.

Judy A Stricker

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

532

To BLM C/O Bob Ross
Grass Creek Area Draft SIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-5139

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

532.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Pooted Ferret inferences.

Terry L Stricker

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

533

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the Alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

533.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Robin Walters

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND WYOMING

534

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the Alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

534.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Ronald Jeffs

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

535

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

535.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Shorn Decker
Clyde J Olde

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

536

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

536.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

William D. Rhodes

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

537

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

537.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

538

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

538.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

539

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

539.2

I object to the small consideration given to too economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Carolyn Trumbull

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

540

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

540.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Robert L. Selby

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

541

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

541.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog, Black-Footed Ferret inferences.

James L. Shelly

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

542

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

542.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

James L. Shelly

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
GRAND JUNCTION

543

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area NMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the Various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

543.2

I object to the small consideration given to the economic impacts to Businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
GRAND JUNCTION

544

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area NMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the Various alternatives. Especially those inbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

544.2

I object to the small consideration given to the economic impacts to Businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

545

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

545.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Gray Tucker

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

546

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

546.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Wilfred C Mann

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

547

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

547.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Bonnie Newton

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
BILLINGS, MONTANA

548

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

548.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Barbara Jones

549

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Rose
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area EMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intendded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

549.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Richard Mill

550

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Rose
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base) and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area EMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those intendded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

550.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Kurtis L Moore

551

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

551.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Julian O. Cole

552

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-8195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

552.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

553

RECEIVED
MAY - 9 1995
BUREAU OF LAND MGMT.

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6193

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used in make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that harper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

553.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

554

RECEIVED
MAY - 9 1995
BUREAU OF LAND MGMT.

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6193

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that harper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

554.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

555

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

555.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

556

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

556.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

557

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

557.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Rand Michael Cole
Rand Michael Cole

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

558

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

558.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

559

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

559.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

560

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base),and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

560.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

561

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the Alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

561.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

Martin D. Dobson

562

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft RMP
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

Dear Mr Ross,

I have re-written most of my comments from individual loseleaf pages into the Draft RMP document with the hope that it would expedite the process of cross analysis. It appeared that it would be faster to review if the comments were at least more easily referenced. Due to the time requirement, did not etch a comment by each subject if it was repeated throughout the document. Instead I would hope the comment would be used for the topic in all locations it is discussed.

I have been asked to continue to contribute input thru the county commissioners for Big Horn County and Park County and through them have additional detailed information for you on Oil and Gas. If you have questions or would like to talk about any of the subjects, don't hesitate to contact me.

Martin Dobson

[redacted]

Martin D. Dobson

[Because of the format and volume of Mr. Dobson's comments, they are not being printed in this document. Interested persons are invited to peruse these comments at the Worland District Office during normal business hours.—Ed.]

563

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Marathon Oil Company

Rocky Mountain Region
Production/United States

1501 Stampede Avenue
Cody WY 82414-3270
Telephone 307/587-4961

May 8, 1995

Bureau of Land Management
Bob Ross, Team Leader
P. O. Box 119
Worland, WY 82401-0119

Dear Bob,

Marathon Oil Company appreciates the opportunity to provide additional comments on the Bureau of Land Management's (BLM) Grass Creek Resource Management Plan (RMP) Draft Environmental Impact Statement (EIS) that was released in January, 1995. Previous official comments for Marathon were presented by E. M. Swarzman, Marathon's Exploitation Manager, at the BLM's public hearing on May 3, 1995, as well as my comments at the open house in Meeteetse, Wyoming.

As the number one liquid hydrocarbon producer in both Wyoming and the Grass Creek Resource Area (RA) as well as being active in Grass Creek for over eighty years, our company has a strong interest in the outcome of this EIS. We do disagree with the proposed alternative in this Draft EIS. Marathon proposes a preferred management scenario that will result in a wide range of new, economic opportunities for our industry. Marathon would recommend the use of Alternative B or a new alternative that would allow our industry reasonable access.

The proposed management for both our industry and the livestock industry will in turn result in providing even more economic stresses on both the four counties in the RA and Wyoming that benefit from the revenues generated in the Grass Creek Resource Area. While the hydrocarbon production from this RA is only a small part of the nation's production from Federal lands, it is ironic that the BLM's National Performance Review efforts are proposing incentives for our industry to find new reserves on federal lands while, in turn, the proposals for management of Grass Creek are to restrict access to those same lands. The BLM must work with the commodity industries and the local government officials in order for the management of the federal lands to support the economy of the communities.

As we have stated over the past few months, Marathon is willing to work with the BLM and the counties to develop a Grass Creek Resource Area management recommendation which will allow our industry opportunities to explore for hydrocarbons; continue to provide revenues to the communities; and minimize impact on environmentally sensitive areas.

A Subsidiary of USX Corporation

The following comments are suggested changes to the Draft EIS and additional support information to be considered in the document.

Produced Water
In Wyoming, produced water from our industry has been surface discharged or reinjected through various permit mechanisms for many years. Most of that produced water is of a quality that it can be beneficially used by others. Several years ago, the EPA and the Wyoming DEQ developed new water quality standards covering our surface discharge permits. Testimony from industry and individuals during that time provided insight into the value of the produced water. Attached are copies of pertinent testimony and public statements (red covered, bound book) about the produced water. In particular, my testimony should provide the BLM a basis for determining the economic value of the water through irrigation use.

I would suggest that the Worland BLM contact the Cody BLM and obtain a copy of the USFWS's study of Lake Lock Katrine in Marathon's Oregon Basin field. This study was the first detailed study, to my knowledge, of the affects of produced water on waterfowl. Reading the study, not the abstract, supports the fact that little or no affect to the birds results from the water.

The previous information should be incorporated in this EIS, possibly on pages 84, 85, and 195. As stated (located in front of red book) by Mr. Enright, previous Cody Resource Manager for the BLM, the produced water is an important benefit to management of the public land.

Historical Issues
Attached for your information is a copy of a letter provided to Northwest College concerning the history of our industry and Marathon. While we do not object to surveys of oil and gas fields for historical significance being conducted as suggested on pages 19, 175, and 189, we strongly recommend that the EIS include language that specifies no restrictions on operations will be imposed as a result of the surveys. These fields should be considered living history, not preserved history.

Visual
On page 62, possible screening of industry operations is suggested for visual management. As noted in the previous section, our industry started before Wyoming was a state. Because of our historical significance, it is suggested that enhancement rather than screening be used for this for management. It appears hypocritical to recognize our historical significance in the EIS and then suggest visual restrictions. Maintenance of our operations is supported in order to show a clean, neat operation; however, screening is not recommended.

Soil Loss
On pages 126 & 127, a study of soil losses from various land uses is included. For my industry, the soil losses appear excessive. Since it was stated that the study was a computer model, I would suggest that compaction and stabilization cover be incorporated in the study which, in turn, should result in more reasonable data.

Northern Rocky Mountain Gray Wolf
On page 201, the discussion of the wolf should be deleted. The USFWS's final EIS on the grey wolf specifically excluded any protection outside Yellowstone Park. The species is considered to be "experimental" and not to be protected.

Seismic Operations
Three-D seismic is a modern oil field exploration tool used to locate new fields. Shooting a 3D seismic survey involves bringing specialized people, equipment, etc. to a location and conducting the survey over a period of several days. The local economic benefit from such a survey would be expenses associated with motels, meals, local purchases, and equipment repairs. It is estimated that a typical 3D seismic survey would result in local expenditures of $5,000 to $10,000.

As stated in the EIS, the economic value of a seismic line is approximately $8,000/mile. A typical 3D project is approximately 10 miles square with 20 miles of source and receiver lines and 20 to 30 miles of 2D seismic lines. Utilizing the economic value in the EIS, a 3D project would have a value of about $700,000 or $800,000. Statistically, approximately ten 3D projects would result in one discovery field; therefore, the economic value of these projects for a new field would be approximately seven to eight million dollars.

Wildlife Restrictions
In general, we believe that the federal agencies do not provide sufficient justification for surface access restrictions on our industry in order to prevent any possible impact on wildlife. It is our opinion there are many studies on other sources that can negatively influence wildlife survival more so than our industry. For instance, published articles indicate that predators create significant impact on wildlife. Recent articles in the monthly publications of "Ducks Unlimited" and "The North American Bronghorn Foundation" are but two sources of studies of the affect of predators. Those articles can be provided to the BLM. Also, droughts reportedly have an impact on the wildlife. The agencies need to start considering these impacts also in conjunction with our possible impacts.

No Surface Occupancy (NSO) Restrictions
Our industry objects to the ACEC proposal and the proposed NSO management for the upper Owl Creek area. Expanding NSO restrictions, such as the Legend Rock Petroglyph Site, provide protection of sensitive areas and still allows access for the community industry. Blanket NSO management, such as the 10 mile by 2.5 mile "ACEC" area, is not reasonable. While there are locations in this area that should be avoided, corridors of access for exploration should be incorporated in the surface management for approval on a case by case basis. Should reserves be discovered, the operator can design a development scheme with the BLM that would minimize surface impacts.

As mentioned in previous meetings, cluster development with directional or horizontal drilling could be incorporated, depending on the depth of the formation and the reservoir conditions. I am including a video and written material for Arco's Sheep Mountain project in Colorado that was developed with the BLM. This project shows a successful coordination with the BLM that minimized environmental impacts and resulted in a successful hydrocarbon development through cluster development.

Controlled Surface Use (CSU) Restrictions
Marathon would recommend that the CSU management including the ceasing of maintenance and production operations be dropped. Many cases in our industry, in recent times, have incorporated automation techniques to minimize the necessity of continual access to active wells. Arco's Sheep Mountain project that is attached is one of those cases. As mentioned in the Wildlife Restriction comments, the need for any CSU restrictions should be justified. As with the NSO proposal, each industry proposal should be developed on a case by case basis, rather than used blanket restrictions.

Operations in Sensitive Areas
Our industry has explored and developed hydrocarbons in sensitive areas for many years and throughout the world. In 1997, I used a literature search to obtain copies of various articles concerning operating in sensitive areas and submitted them to the Shoshone National Forest personnel for consideration in their leasing EIS. Copies of those thirty-one articles are attached for your consideration in this EIS.

Existing Fields
While the Draft EIS does not propose restrictions for the existing fields, the areal limits of to restrictions appear to be the field or unit boundaries. Marathon recommends that the areal limits for no restrictions be 1mp miles past the boundaries of the fields. The

reason: Marathon has discovered that three structural or stratigraphic traps utilizing 3D seismic extended past the boundaries of fields that we currently operate in the Big Horn Basin.

Production Response From The Management For The Four Alternatives
Marathon has not completed their analysis of this data but will provide the data soon.

Socioeconomics
As Mr. Dauenheim stated in his testimony, the various alternatives will lead to dramatically different exploration and development scenarios that would, in turn, result in different hydrocarbon production in the future. After Marathon and others provide the support data, it is recommended that the University of Wyoming develop tables showing the economics impact, including tax and royalty revenues, of the four alternatives in the EIS. We would recommend that the Worland BLM obtain a copy of the Expanded Moxa Arch Area Draft EIS to use as a guide for the socioeconomic section. This document can be obtained from Bill McMahan of the BLM's Rock Springs District Office.

Cultural and Archeological Issues
Marathon realizes that cultural and archeological issues are covered under existing federal regulations; however, it is recommended that the Worland BLM make every effort to streamline the permitting process. As mentioned on page 153 in the EIS, our industry's actions have resulted in the majority of the cultural finds. Since our industry has been diligent in reporting any finds, even in cleared permitted areas, Marathon believes that an effort to reduce the cost to our industry will not reduce the discovery of any cultural finds. A reduction in costs of the permitting would, in turn, result in more incentives to increased activities by our industry.

Summary
Marathon recommends that the BLM carefully consider our proposals. We are willing to provide additional information, if necessary. Should you have any questions concerning this letter, please let me know.

563.6

Bureau of Land Management
Bob Ross, Team Leader
May 8, 1995
Page 6

Sincerely,

MARATHON OIL COMPANY

Pat Childers
Government Affairs Coordinator
Rocky Mountain Region

:CPC (3151-12)

Enclosures

xc: L. M. Mueller
G. M. Lewis
Petroleum Association of Wyoming
Rocky Mountain Oil and Gas Association

564

RECEIVED
MAY
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Biodiversity Associates
P.O. Box 6032, Laramie, WY 82070 (307) 742-7978 fax 742-7989

May 6, 1995

Bob Ross, Teem Leader
Gress Creek RMP
Worland District, Bureeu of Land Menagement
PO Box 119
Worland, WY 82401-0119

Dear Bob:

The following constitute our comments on the Grass Creek Resource Area Resource Menegement Plan Draft Environmental Impact Stetement (DEIS). Please include them in the public record and respond to them in subsequent environmental documents.

Biodiversity Associates is e 501(c)(3) non-profit conservation organization, based in Laramie, Wyoming, which works to protect end restore netive species end their hebitats.

Introduction end General Comments

We realize that producing a comprehensive, long-term management plan is e challenging task, as is enalyzing the impacts of various elternetive plens. However, we find the DEIS extremely difficult to read. And it has been virtuelly impossible for us to determine the basic differences between, and relative impacts of, the various alternatives. The tables which attempt to describe the alternatives, assumptions, mitigation measures, and environmental effects are confounding et best. In addition to clarification end reformatting, the tables also need, at e minimum, some sort of numbering scheme so that specific items can be referenced. The DEIS also appears to confuse elternetives, essumptions, end effects, end ectivities and resources. We will cite specific examples of these problems below.

The BLM hes an obligation to menage public lands under the multiple use concept in e menner thet protects the public's resources. This includes wildlife, plants, and recreation opportunities. Yet the DEIS and preferred alternative appear to be nothing more than extractive industry development plans. The greatest emphasis is on oil and gas development and livestock grazing. All other uses seem to be lumped into the "other" category and ere subordinate to mineral development and grazing by domestic livestock. This is not acceptable and is contrary to law.

For example, the preferred alternative makes the entire 1,171,000 acres (100% of the BLM mineral estate) of the planning area open to oil and gas leasing and applies No Surfece Occupancy (NSO) stipulations to a mere 1.7% of the plenning erea. In fact, every elternative analyzed in the DEIS makes every acre open to leasing. Only the leasing stipulations are different. This is not e reasonable renge of elternatives under the CEQ regulations. Furthermore, many areas important for wildlife, primitive recreetion, and other values that should have been withdrawn from mineral entry were not. And, given how little of the nation's land is in an undeveloped state, the few remaining undeveloped tracts in the Grass Creek Resource Area (RA) should be protected from development. In particular, we believe that the Owl Creek, Sheep Mountain, Red Butte, and Bobcat Draw Badlands

564.2

Wilderness Study Areas should be preserved in an undeveloped state and protected as Wilderness. These make up only 6% of the public lands in the RA and their protection cannot be construed as an unreasonable measure. In the event that Congress does not designate the WSAs as Wilderness, we urge that the areas be protected from development as ACECs. We elso support the lerger acreeges for the WSAs es presented in *Wilderness At Risk: Citizen's Wilderness Proposal for Wyoming BLM Lands* (prepared by the Wyoming Wilderness Coalition). Even if these lands were not noteworthy because of geological features, wildlife and plants, and cultural sites, they are unique and of speciel importance *merely because they are undeveloped* and should be protected from mineral development of any kind and from ORV and automobile use.

The WSAs ere also worthy of protection because unmotorized recreation is given so little emphasis in the preferred alternative. In general, development and motorized recreation are the focus of the RMP, while virtually no areas are reserved for non-mortorized activities. This can herdly be considered multiple use. Regardless of eventual designation as Wilderness, more than 6% of the areas should be reserved for undeveloped, unroaded recreation. We urge BLM to provide more opportunities for semi-primitive, non-motorized recreation—well beyond that in the preferred alternative.

Another example of the short shrift given to all but extractive activities is the lack of up-to-date vegetation data. While the DEIS states that one of the three principal planning issues to be addressed in the RMP EIS is vegetation management (DEIS et 11), the entire analysis appears to depend upon vegetation surveys conducted nearly two decades ago, between 1977 and 1979 (DEIS at 135). A greater time has pessed since the vegetation was assessed than the proposed RMP will likely be in effect. Furthermore, the DEIS defines ecological condition as the current vegetative composition compared to the potential natural community (DEIS at 135). Eighteen year old data cannot be used to specify the current condition. Using such old data is a fatal flaw and is a violation of 43 CFR § 1610.4-3.

In general, we support strong environmental protection measures and the protection of resources in short supply in the RA and nationally. This means prohibiting development in undeveloped ereas end protection of unique wildlife and plant resources, waterways, and the like. We believe resource extraction should not get the emphasis is has gotten from BLM. While alternetive C goes farther than the preferred alternetive to protect some of the natural values, it does not go nearly far enough. There is no alternative offered in the DEIS which protects the wildlife, plant, and natural values to the extent we believe is necessary to protect the public interest and meet the requirements of law.

National Naturel Landmarks end ACECs

In general, we support the designation of Fifteenmile Creek, Meeteetse Draw, and Upper Owl Creek ACECs. We also support the designation of Gooseberry Badlands, Eest Ridge-Fifteenmile Creek Badlands, and Tatman Mountains as National Natural Lendmarks (NNLs). We urge BLM to withdraw the ACECs and NNLs, as well as the WSAs, from oil and gas leasing and from hard rock mining.

Specific Comments

Page 5 ¶ 1 We do not agree with the statement that "each [alternative] represents e complete and reasonable resource management plan" because each alternative makes the entire RA open for oil and gas leasing. For this reason, we believe that none of the

564.3

elternatives is reasonable and that the entire process is contrary to multiple use as defined in 43 CFR § 1601.0-5(f).

Page 7: Selection of Preferred Alternative The second statement in this section, that "Before restricting development, was the potential for occurrence of energy and mineral resources considered?" implies thet protection measures were more likely applied to areas without potential for development. This is backwerds. Protective measures should be applied to areas that require protection, regardless of the activity which might be envisioned.

Page 8, ¶ 2 The phrase "conserve their richness of plant end animal species" should be changed to reflect native plant and animal species.

Page 8, ¶ 3 Assessing biological diversity by assessing habitat has many shortfalls and generally does not take into account e number of factors such as habitat effectiveness, spatial considerations, and population status. Actual, on-the-ground, quantitative measurements of plant and wildlife populations are required.

Page 8, Development of Mitigation Needs This is the first discussion in the DEIS regarding protective measures and it is unclear, throughout the document, exactly what mitigation, stipulations, and other measures will be used to protect the environment. The first paragraph states that each alternative included mitigations to protect or reduce adverse effects to resources. We could not find a list of specific mitigation requirements in either the DEIS or the other information prepared by BLM[1]. Is the DEIS referring to the differences between alternatives listed in Table 2 and Table 3? If not, where are these measures spelled out? We believe that concrete measures should be applied to activities, regardless of alternative, which would protect environmental values, wildlife, end plants. If a given activity would have negative environmental impacts, strong protective and mitigating measures should be applied (if the ectivity is approved), regardless of alternative. Do measures required to protect the environment and comply with environmental protection laws and policy really depend upon which elternative RMP is under consideration?

Page 9, Wilderness As mentioned ebove, the WSAs, if not designated Wilderness by Congress, should be protected by designation as ACEC or other administrative action.

Page 9, Wild and Scenic Rivers We disagree that no public lands were found to meet the eligibility criteria. We believe that the South Fork of Owl Creek meets the criteria and should be designated a Wild and Scenic River. Regardless of designetion, the river/river corridor should be protected from oil and gas exploration, leasing, and development as well as other mineral entry. The river and corridor should also be protected from roads, impoundments, hydroelectric facilities, and other developments. We urge BLM to pursue a withdrawal from entry under the 1872 mining act.

Page 11, Access We believe that there are already enough, or even too many, roads on these public lends. No new roads are needed in the RA and we urge BLM to construct no new roads and to eliminate those roads that are not needed or are contributing to resource demage such as sedimentation, wildlife impacts, etc.

[1] We received a document entitled *Wyoming BLM Standard Mitigation Guidelines for Surface-Distrubing Activities* but this contained only boiler plate language and generic statements. In addition, most of the boiler-plate included caveats such as "exception, waiver, or modification of this limitation may be approved in writing..." This is hardly strong protection.

Page 13. Developing Alternatives Please see the comment above for Paga 5,¶ 1.

Page 14. Elimination of Timber Harvesting The rationale in the DEIS for not considering the elimination of timber harvesting is preposterous, incorrect, and unsupportable. We could not disagree more with the "cut it down to save it" philosophy embodied in the DEIS. Disease, insects, and fire ere completely natural and are in fact essential components of forest acosystems. Tha kay to forest health is meintenanca of natural procasses, including fires, insects, end dead and dying trees. There is a large body of information supporting these principles. On the other hend, logging and roads are not natural processes and are not necessary for forest health. Human disturbance and fire supression—not fire or insects—remain the greatest threat to forest ecosystem integrity. The public's forested lends should not be treatad by BLM as industrial tree farms. Custodial managament, including a let burn policy for lightening-caused fires, is the appropriate approach. Furthermore, the impacts on native wildlife of forest fragmentation caused by clearcutting, group selection cutting, and roads ara measurable but have not been taken into account in the DEIS. Subsequent environmental documents (supplemental DEIS) should includa a quantitative analysis of the effects of forest fragmentation on forest species, especially those dependent upon interior forest, and show how these effects will be mitigatad. Finally, we know of no refereed scientific papers in the literature which show that "harvesting of forest products helps sustain the ecologicel processes that maintain the healthy condition of the forast" and we balieva this is simply arm-waving on the part of BLM. If you have any documents which show that timber harvest is better than fire and other natural disturbances, please sand tham to us and include appropriate raferences to these papers in subsequent environmental documents. We urge BLM to eliminate commercial timber harvest from tha selacted alternative.

The following comments on Table 2 refer in general to the preierred alternative.

Page 15, Table 2 As mentioned previously, soma sort of numbering scheme should be added to Tables 2, 3, 15, and 16 so that specific portions of the tables can be easily raferenced. Also mentioned previously, the information in Table 2 should ba reformattad for easier reading and so that tha diffarances between the alternativas can be more easily discerned. Those features, actions, etc., which are the sama across all alternatives should not ba listed in the tabla showing the differencea betwaen alternatives. Those items in common should ba shown separately and should be dascribed only once. For example, some of the items listed in Table 2 appear to be similar to mitigation measures or stipulations and many apply to all alternatives analyzed. If these are indeed protective measures, they should be presantad as such in a different table.

Page 20-23, Table 2 Fire management appears to be identical in all alternatives. A range of alternative fire management approaches should have been included in the alternative management plans. In addition, the impacts of the fire policy on the various resources—including economic analysis—are not discussed anywhera in tha Environmantal Consequences chapter. These ere fatal flaws in the DEIS.

In general, we believe naturally occurring firas should be allowad to burn unless there is a threat to human health or safety or species of special concern. In undeveloped

areas such as the WSAs, naturally occurring fires should not be suppressed. If for some reason fires are fought in undeveloped areas, only non-mechanized equipment should be used.

Regarding the use of prescribad fira on paga 23: It is ludicrous to "rehabilitate old timber sale areas" by prescribed fire when ellowing natural fires to burn, without having environmentally damaging timber sales, would obviete the need for such prescribed fires.

We are wholeheartedly opposed to the use of prescribed fire or mechanical treatments to increasa forage for domestic livestock. The removal of sagebrush, juniper, and limber pina for tha sole purpose of incraasing forage is unwarranted. Privately owned domestic animals should not be given preference over netural procasses and wildlifa on the public lands.

Page 25, Table 2 As mentioned previously, forest health is not a reason to cut down the forests on public lands. Mistletoe and mountain pina beetle ara components of the natural forest and are not an adequate reason for industrial cutting. There is no compelling reason to have commercial harvesting on these lands, and we oppose commercial timber activities on the few forested areas of the RA. The language in the Management Actions part of the Forestland Managemant section of the table reflects an industrial forestry parspective, not an ecologically informad one; this is directly contrary to the principles of ecosystem management, which seeks to work with natural processes, not against them.

The 15 year restocking standard is ebsolutely inadaquate and unsupported and should be 5 yaars as a maximum. We oppose any claarcutting on the public lands, and we oppose any road building, especially if it is for the purposes of timber sales. If there is any scientific basis for wildlife needing industrial cutting (and we believe there is not), please make it available to us and include it (or references to it) in subsequent documents.

Page 35, Table 2 The Right of Way avoidance areas in Alternative C should be applied to the preferred alternative. These important wildlife araas should not be subject to rights-of-way under any circumstances.

Page 38, Table 2 In situations where resource damage is occurring from livestock grazing, livestock should be removed from the public range. If for some reason livestock are not removed, any fences, construction, etc. undertaken to prevent damage should ba paid for by the owner of the livastock. The public should not have to pay to prevent damage to public lands from domestic livestock owned by private, for-profit extractiva operations.

Page 41, Table 2 What does it mean that "livestock grazing would be managed to enhance riparian stream habitat..." ? Grazing cannot be used to fix tha problems that it most likely caused.

Page 43, Table 2 As mentioned previously, it is neithar acceptable nor in compliance with law and regulation to make the entire RA open to oil and gas leasing. In addition,

the range of surface occupancy stipulations presented is inadequate to provide a reasonable ranga of alternatives or to meet the multiple use mandate.

Page 47, Table 2 We support the off-road vehicle restrictions in the preferred alternativa and urge the BLM to restrict ORV use in the entire RA to designated roads and trails. We also support increased funding for enforcement of ORV restrictions as well as prompt and severe penalties for those found to be in violation of such restrictions.

Page 49, Table 2 If the management objectiva for racreation is to enhance opportunities for primitive recreation (as is stated on p. 49), all remaining undeveloped areas should remain undeveloped. We support this concept end urge protaction of unroaded areas as Wilderness and ACECs. The oil and gas, timber, and grazing activities in the preferred alternative would not allow for anhanced primitive recreation opportunities and are therelore in conflict with the management objective for recreation.

Page 51, Table 2 We do not support the construction of any additional roads, even for recreation.

Page 53, Table 2 The wording of the vegetation management objective makes it clear that the emphasis of BLM is on timber production and livestock. We oppose this epproach and believe that tha public is best sarved if wildlife, rare plants, and undeveloped area protection are given tha greatest emphasis.

Page 53, Table 2 Tha actions undar the preferred alternetive for Candidata and T&E species are not adequate to protect valuable public resources and are not in compliance with applicable BLM Manual requirements. The manual at 6840.06 (C)(1) requires that BLM "Determine the distribution, abundanca, **reasons for current status,** end **habitat needs** for candidata species... **and evaluate the significance of the landa administerad by BLM or actions in maintaining those species.**" (emphasis added). We could not find anything in the DEIS or supporting documentation that indicates BLM met the requirements of this provision.

Because the required evaluations of significance mentioned above were not performed, it is likely that all of the alternatives analyzed, including tha preferred alternative, are not in compliance with BLM Manual 6840.06 (C)(2) (b) through (d). These provisions require management plans for candidata species, specific habitat and population management objectives designed for recovery, strategies nacessary to meet thosa objectives, and monitoring of populations and habitats to determine whether management objectives are being met.

Page 57, Table 2 As mentioned ebove, the approach to forestland vegetation presented in the DEIS—which works against rather than with natural processes—is not consistent with ecosystem management principles.

The DEIS fails to offer the scientific basis BLM is relying on for 10% old growth management? What exactly does "Ten percent of the forestlands would be managed for old growth" mean? Does it mean that 10% will be reserved in an old growth condition and designated as protected? This needs to be clarified in later documents.

Page 63, Table 2 We support efforts to improve water quality and increase the percentage of properly functioning riparian areas. The preferred alternative does not go

far enough to halt damage, however. We advocate complete removal of domestic livestock from impaired areas—particularly riparian areas. We also support additional funding for enforcement of protection provisions, stocking levels, etc.

Regarding the use of vehicles, we believe all motorized vehicles should be restrictad to designated roads and trails. Does the prohibition against driving on wet soil or slopes greater than 25% apply to roads and trails, everything, or just off-road? This needs to be clarified.

Page 69, Table 2 The population and species referencas under the Wildlife and Fish Habitat Management Objectiva should emphasiza native species only. Diversity for the sake of diversity is not the point. Maintaining viable populations of native species is the point.

Page 70, Table 2 The caveat "To the extent possible" is not acceptabla if the wildlife population objectives of the Wyoming Game and Fish ere based on scientific information such as ecological carrying capacity, etc. Who defines what is "possibla"?

As mentioned above, the DEIS alternatives do not meet the requirements of the BLM manual for Candidate T&E species.

Page 72, Table 2 A full analysis of the ecological impacts of predator control activities is necessary before any predator control activities take place. No lethal predetor control should be allowed on public lands.

Page 74, Table 2 Native species should be emphasized in riparian areas. Exotic fish should not ba introduced.

Page 75, Table 2 Rahabilitation efforts on Fifteenmile Creek watershed should be paid for by the parties responsible for the degradation wherever possible. If it can be determined that particular permittees are responsible, they should be charged for reclamation costs. If structures need to be ramoved to meet environmental goals, those who pleced tha structures should pay for the removal.

Page 79, Table 3 We support Alternative C Wildlife Resources constraints. Under the preferred alternative, the constraints begin with the phrase "Unless site-specific environmental analyses demonstrate that adverse effects can be mitigated or avoided...". If this caveat is to be retained, e large-scale, cumulative impacts analysis should be required in the site-specific environmental analysis.

Page 132, first ¶. Tha statements about forestland production show a clear extractive, commodity bias and have nothing to do with the ecological condition of the forested lands. To reiterate from above, this is not a commercial tree farm and it should not be managed as such. Cutting a forest merely because it is old is inappropriate.

Page 153 and Table 15 This table is actually a description of the alternatives, not a list of assumptions. Much of the information here should have been presented in other chapters.

Page 160, Table 15 The range of alternatives for active praference grazing is unreasonable and inadequate to meet the legal and regulatory requirements.

Page 193, Socioeconomics: We find the economic analysis totally unsupported and, at face value, simply preposterous. Subsequent documentation should clearly explain the figures and the methodology, assumptions, etc.

Page 198, Wildlife Habitat: The issues of fragmentation of wildlife habitat must be addressed and quantified, especially those from roads and timber harvest.

Page 202, Preferred Alternative Summary: The description of forest structural diversity is unsubstantiated and erroneous. It does not accurately portray the value to wildlife of older forests. This again is a fatal flaw.

Thank you for considering these comments.

Jeff Kessler
for Biodiversity Associates

BUDD-FALEN LAW OFFICES, P.C.
422 West 26th Street
Post Office Box 844
Cheyenne, WY 82003-0844
Telephone (307)637-7083
Telefax (307)637-7601

Karen Budd-Falen
Franklin J. Falen

David K. Frank
Peter E. Hart
*admitted in Michigan

RECEIVED
MAY 10 1995
BUREAU OF LAND MANAGEMENT
BIG PINEY, WYOMING

May 8, 1995

CERTIFIED/RETURN RECEIPT
P 281 243 793

Mr. Bob Rose
P.O. Box 119
Worland, WY 82401-0119

Re: Comments for Grass Creek Resource Area Plan

Dear Sir:

On behalf of Hillberry Cattle Company and Tim Hart, this letter contains comments to the Bureau of Land Management (BLM) Grass Creek Draft Environmental Impact Statement (DEIS) and proposed Resource Management Plan (proposed RMP or Plan). Hillberry Cattle Company is the owner of a ranch in the Grass Creek Resource Area. Tim Hart, who has leased the ranch for approximately ten years, is the BLM permittee on the Buffalo Creek and Coal Creek allotments and is one of the permittees on the Prospect Common allotment. The Hillberry Ranch consists of private property, private water rights, state leased lands and grazing preference to 1,836 Animal Unit Months (AUMs) of livestock grazing on federal lands in the Buffalo and Coal Creek allotments. In addition, they have preference to AUMs in the Prospect Commons allotment.

This Plan directly and severely impacts the land owner and permittee by (1) proposing a reduction in the number of livestock they can graze on their allotments, state leased land and private land, (2) forcing them to comply with certain utilization restrictions, (3) allowing other uses such as recreation and wildlife to dominate livestock grazing, etc. These concerns and impacts are specifically described below. This Plan must be revised to correct these concerns.

THE PLAN VIOLATES MULTIPLE USE MANDATES OF THE FEDERAL LAND POLICY AND MANAGEMENT ACT

The Federal Land Policy Management Act (FLPMA) requires that the BLM manage for multiple use. 43 U.S.C. § 1701(a)(7). According to BLM regulations, domestic livestock grazing is a major component of multiple use. 43 C.F.R. § 1725.3-3. Although under the concept of multiple use, not every use must take place on every acre, making livestock use inferior to all other uses throughout the resource planning area is illegal. For example, the Grass Creek proposed RMP manages for an increased yield in wildlife and recreation values and decreased domestic livestock grazing. Specifically see the general criteria of the Plan listed on page 7 which states that grazing practices must be compatible with other resource management objectives.[1] Page 199 of the Plan states that livestock grazing restrictions will be used to benefit wildlife and to increase their populations. In contrast, there are no

[1] See also the discussion of ecosystem management and biodiversity. These concepts guide the proposed RMP but ignore traditional multiple uses.

requirements stating that other management objectives must be compatible with livestock management. These examples, as well as the specific RMP requirements listed below, violate multiple use as defined by FLPMA.

A. Management of Wildlife in Violation of Multiple Use

1. Elk[2]

Page 142 of the Plan states that 216,000 acres of public, state and private lands are currently elk habitat. Included in that amount is 81,800 acres of crucial elk winter range. Page 58 of the RMP also notes that up to 76,000 acres will be managed to achieve desired plant communities (DPC) for elk winter range and 44,000 acres will be managed to obtain the DPC most favorable for elk calving grounds. Livestock grazing would not be allowed in elk calving areas in 23 allotments from May 1 to June 30. In the remaining areas described as elk habitat, livestock forage utilization will be limited to 25% to 35% of the current year's growth if grazing occurs during the growing season. In other portions of elk habitat where livestock are grazed when the plants are dormant, the utilization limit will be 60%. Once the maximum utilization level is reached, regardless of the type of use (i.e. livestock or elk) that causes the maximum utilization, livestock will be removed. In other areas designated as elk habitat, no

[2] Although the Hillberry Cattle Company is concerned about the favoritism the BLM shows for elk over livestock, the protections for elk apparently do not affect the Hillberry/Hart allotments. However, the discussion illustrates that the concept of multiple use is violated because livestock are subordinated throughout the Resource Area.

livestock water developments will be allowed. Certainly the thrust of the elk management guidelines is that livestock are dominated by elk in violation of multiple use.

2. Big Horn Sheep[1]

Up to 13,000 acres will be managed to obtain desired plant community objectives for big horn sheep. RMP at 98. Currently big horn sheep use 11,800 acres. Plan at 142. An additional 34,000 acres would be excluded from domestic sheep grazing in favor of big horn sheep. Id. Again this is an example of how livestock are dominated by wildlife use.

3. Moose[1]

Page 142 of the RMP states that moose use approximately 107,000 acres in the planning area and up to 7,400 acres of habitat will be managed for moose reproductive success. The riparian areas within the elk habitat will be largely managed in favor of moose. This is yet another example of how other uses dominate livestock.

4. Deer

Up to 304,000 acres in the Resource Area will have a desired plant community objective for mule deer winter range. Of this,

---

[1] Although the Hillberry Cattle Company is concerned about the favoritism the BLM shows for big horn sheep over livestock, the protections for Big horn sheep apparently do not affect the Hillberry/Hart allotments. However, the discussion illustrates that the concept of multiple use is violated because livestock are subordinated throughout the Resource Area.

[1] Although the Hillberry Cattle Company is concerned about the favoritism the BLM shows for moose over livestock, the protections for moose apparently do not affect the Hillberry/Hart allotments. However, the discussion illustrates that the concept of multiple use is violated because livestock are subordinated throughout the Resource Area.

1,481 acres of riparian area, representing 71% of the entire planning area, will be managed for deer. Therefore a total of well over 1,000,000 acres will be managed for deer habitat.

The deer habitat provisions create a serious concern for the Hillberry Ranches and Tim Hart. Map 34 indicates that a substantial amount of the Buffalo Creek allotment is designated as deer winter range or deer crucial winter range. A large portion of the Prospect Commons and the Coal Creek allotments are also depicted as deer crucial winter range. Within these areas, livestock use will be held to strict utilization standards again meaning that livestock will be removed once the utilization standards are met. Therefore, it is clear that the majority of the Hillberry/Hart allotments will be managed for deer over livestock in violation of multiple use.

5. Antelope

Page 147 of the Plan notes that there are 1,927,000 acres of antelope habitat and that 128,600 acres are designated as crucial winter range. Page 60 also notes that up to 111,000 acres will be managed to obtain desired plant communities that best suit pronghorn antelope winter requirements. An additional 4,700 acres will be managed for a desired plant community that facilitates antelope reproduction.

Hillberry Ranches and Tim Hart are also affected by the designations for pronghorn antelope. Large portions of the Buffalo Creek and the Prospect Commons allotment are designated as pronghorn winter or pronghorn crucial winter range. Again it is

clear that in these areas, the management of livestock and the welfare of the ranch operators will be secondary to the antelope.

6. Upland Birds

According to the Grass Creek proposed RMP, up to 343,000 acres of habitat will be managed to achieve the desired plant community for sage grouse. Map 35 specifically indicates that strutting grounds and breeding and nesting grounds are located on substantially all of the Buffalo Creek and Coal Creek allotments. These strutting and nesting grounds also appear to encompass private and state lands owned or managed by Hillberry Ranches. The Prospect Commons allotment is substantially covered with sage grouse habitat complexes, although the Plan apparently does not define what a sage grouse habitat complex is. Again, this habitat designation is of great concern to Hillberry Ranches and Tim Hart as it is clear that the majority of their allotments will be managed to favor sage grouse production as opposed to livestock production.

7. Wild Horses

Domestic horse use will be restricted on 14 allotments. In contrast, the wild horse use area will be increased by 37% to 124,000 acres. To accomodate this increase, livestock grazing will be decreased in this area and may be entirely eliminated if utilization standards are not met. The wild horse area is located in the Fifteen Mile Creek watershed which is designated as an Area of Critical Environmental Concern (ACEC). Additionally, the BLM is willing to spend money to obtain water and land for the wild

horses, although the Plan does not indicate any BLM expenditures to improve livestock production. Again this is a violation of multiple use.[1]

B. Use of Utilization Restrictions and Desired Plant Communities Violate Multiple Use

Utilization of forage is defined as use or destruction of vegetation from all uses including hail storms, insects, wildlife, livestock etc. RMP at 39.[2] However, while this definition recognizes that the other forage uses contribute to forage utilization, only livestock will be removed from an area once maximum utilization restrictions are exceeded. This is a violation of multiple use.

There are several other reasons that the landowner/permittee object to the proposed utilization standards. First, the utilization levels are unreasonably strict. For example, in areas where DPCs are set for wildlife species, livestock utilization is restricted to 25% to 35%[3] for use during the growing season. Although any regrowth that occurs after livestock are removed would decrease the utilization, such decrease will not be measured.

In areas grazed after the plants are dormant, the utilization levels are 60%. Still because no other wildlife species are

---

[1] Additional wild horse concerns will be further addressed below.

[2] As will be illustrated below, this definition of "utilization" is illegal under existing regulations.

[3] BLM manuals define utilization of 30% to 40% as light.

governed by these utilization requirements, wildlife will have the clear advantage over livestock grazing.

Second, even though DPCs are established for the other forage users, no area under the Plan will be managed for livestock DPCs. In addition, all vegetative treatments will be designed to benefit DPCs. RMP at 42. Since there are no DPCs for livestock, it is clear that none of the vegetative treatments will be designed for the benefit of livestock. For example, the Plan calls for 9,000 acres of prescribed burns[8] (a burn is a form of vegetative treatment,) therefore no burns will be prescribed for livestock benefits. RMP at 184.

Third, on page 39, the Plan states that grazing strategies will be designed to accommodate key plant growth and their management objectives. Again these objectives favor wildlife or vegetative management not designed to improve livestock grazing. This is a concern to Hillberry Ranches and Tim Hart because the majority of the forage management on their allotments will be in favor of deer, antelope and sage grouse. Again this is a violation of multiple use.

C. **The Planned Reduction in Livestock Grazing Violates Multiple Use**

Table 17, page 190 anticipates a decrease in the active livestock preference from 101,000 to 66,000 AUMs. Such reduction

[8] These burns are to improve habitat for elk, deer and moose. RMP at 23 and 184.

will include a reduction of the AUMs on private and state lands.[9] Many of the AUMs which are considered unsuitable for livestock grazing[10] will be managed for elk, moose, sheep and wild horses. On page 70, the BLM also expresses the intent to manage its land for the Wyoming Game and Fish Department's (WGFD) habitat objectives. Although the landowner/permittee have not had the opportunity to comment on these objectives, it is certain that no objectives for livestock habitat are included. Again, this is a violation of the multiple use concept.

Second, although the BLM is actively pursuing plans to increase recreation, wild horses and wildlife, the Plan specifically forbids any increase in the active preference for livestock grazing. See page 71. The result is that livestock operators will have no opportunity to regain their preference AUMs that are currently held in suspended non-use. In addition to violating the multiple use concept, this also violates FLPMA. In the past, Hillberry Ranches have agreed to cuts in their active AUMs and to participate in range improvements so that these AUMs would be returned when the forage improved. However, the AUMs resulting from improved forage will, along with existing livestock AUMs, be taken from livestock to increase wildlife.

[9] AUMs on private and state land will be decreased by over 19,000 AUMs.

[10] The questionable suitability criteria used by the BLM will be discussed in greater detail below.

D. **Other Multiple Use Violations**

In addition to the above comments, the following points also illustrate that livestock are not being managed as an equal multiple use.

1. While the Plan includes provisions to fence riparian areas from livestock, it includes no similar provisions to fence wildlife or wild horses from riparian areas, nor does it even recognize that wildlife and wild horses can impact riparian areas.

2. The above comment is also true for rangelands.

3. Page 26 of the RMP commits to increasing aspen for wildlife.

4. On page 72, the BLM states that it will manage riparian areas and reservoirs for water fowl production. There is no mention of mitigating the affects of this policy on livestock grazing.

5. 28 miles of riparian stream will be managed for game fish and another 40 miles will be managed for non-game fish. Again, there are no such areas managed for livestock.

6. Pages 51 to 53 discuss the monetary resources the BLM will spend to encourage recreation. Again, no money will be spent by the BLM to encourage livestock production.

7. On page 72, the Plan notes that fences will be modified to favor wildlife. There is no discussion however on how this may affect livestock and there is no discussion of fence modification to improve livestock production. Again because wildlife are being managed over livestock, multiple use is violated.

8. The table on page 136 shows that although livestock is a relatively small factor in causing erosion, the BLM will reduce livestock numbers to reduce erosion. Specifically the Plan states that livestock grazing is widely dispersed, therefore erosion effects must be addressed. However, wildlife is also widely dispersed and there are no provisions to mitigate wildlife caused erosion; indeed, the Plan does not even acknowledge that wildlife can cause erosion.

In summary, the Hillberry Ranches and Tim Hart object to the elevation of recreation and wildlife over livestock grazing throughout the entire planning area. Such dominance can be seen by the BLM's (1) use of DPCs and utilization restrictions favoring wildlife, (2) willingness to spend time, manpower and monetary resources to enhance wildlife habitat and encourage recreation and (3) planned reduction in AUMs. Because these actions violate federal law, this Plan must be withdrawn and revised or it will be successfully challenged.

THE PLAN VIOLATES THE TAYLOR GRAZING ACT

The primary purposes of the Taylor Grazing Act (TGA) are to protect the range resource and stabilize the livestock industry. *Faulkner v. Watt*, 661 F.2d 609 (9th Cir. 1981); *Barton v. U.S.*, 609 F.2d 977 (9th Cir. 1979); *Chournos v. U.S.*, 193 F.2d 321 (9th Cir. 1951). However, the RMP which predicts at least a 35% cut in livestock AUMs, which will not meet these purposes.[11]

[11] Although the drafters of the BLM Plan have referred to the 35% cut in livestock grazing as a 'moderate' decrease, Hillberry Ranches, Tim Hart and most other livestock operators take

It is also a violation of the TGA to subordinate livestock grazing to wildlife and recreation. As stated herein, on page 57, the RMP preferred alternative states that there can be no increase in the current active preference. The use of the RMP to eliminate the suspended grazing preference discourages ranchers from participating in the development of range improvement projects. Such a policy is purely outside of the Taylor Grazing Act. In addition, the principles of the Taylor Grazing Act are violated in that the BLM policy of not allowing any increase in active use means that the ranchers are precluded from receiving any benefit from range improvement projects in which they have participated in the past. Again if ranchers cannot increase their active use by increasing forage or water availability through range improvements, there is no incentive to participate in such projects.

Second, a substantial portion of the Grass Creek Resource Area is made up of state and private lands. Many of these state and private lands are involved in exchange-of-use agreements, allowing the BLM to assure management of those lands which are included within allotment boundaries. The understanding in these exchange-of-use agreements is that the land would be managed for the benefit of livestock.[12] However the BLM, by subordinating livestock

great issue to this. If the drafters of the BLM Plan were guaranteed a 35% or greater decrease in their income by the year 2005, they probably would not characterize it as "moderate."

[12] On page 146, the BLM estimates that there was a total of 256,400 visitor days within the planning area on all lands. The recreational use of the BLM lands is estimated as only 81,178. The BLM assumes that under the management of the preferred alternative, the total recreation days in the planning area would be 373,439.

grazing throughout all allotments, necessarily subordinates the use of the state and private land in the same manner, thereby violating the exchange-of-use provisions under the BLM regulations drafted pursuant to Taylor Grazing Act and the FLPMA. 43 C.F.R. § 4120.2(b).

Third, Section 9 of the Taylor Grazing Act is also violated. Section 9 guarantees the opportunity for an administrative appeal, to an impartial hearing officer, for an evidentiary hearing, regarding any decision negatively affecting the use of an allotment. The proposed RMP mandates that each AMP be developed with many provisions that will seriously impact livestock grazing. However, there will be no appeal of those provisions at that time they are written into the individual AMP because those provisions are mandatory by their appearance in the RMP. While it is true that the proposed RMP can be protested, the guarantee of Section 9 of the Taylor Grazing Act for a evidentiary hearing before an impartial decision maker is lost.[13]

Finally the BLM policy of managing its lands for the habitat objectives developed by the Wyoming Game and Fish Department is

Only 118,200 of those visitor days would be on BLM land. Therefore, 255,238 of those visitor recreation days are apparently on state and private land. In effect, the BLM is managing the state and private lands within the allotment boundaries to increase recreation by 180,013 visitor days. The BLM has no authority to manage exchange-of-use lands in favor of recreation use.

[13] Specifically, if an individual permittee protests the RMP to the State Director, he will be at a disadvantage because he cannot state at this time exactly how his individual allotment will be affected, although he knows the effect will be negative. See comments regarding desired plant community objectives, riparian utilization standards, range utilization standards, etc.

also a violation of the Taylor Grazing Act. Allotments were created pursuant to the Taylor Grazing Act and are defined as an area of land managed for livestock grazing. 43 C.F.R. 4100.0-5. Managing the allotments to obtain the objectives of a State Game and Fish Department is a violation of the Taylor Grazing Act.

THE PROPOSED RMP VIOLATES THE PUBLIC RANGELANDS IMPROVEMENT ACT (PRIA)

The Public Rangeland Improvement Act (PRIA) requires that allotment management plans (AMPs) be developed in consultation, cooperation and coordination with the affected permittees and land owners. 43 U.S.C. § 1752(d). However, there are numerous examples in the proposed RMP where very important elements of the AMPs are predetermined by the RMP. These will significantly and negatively affect the livestock permittees and will deprive them of their procedural rights pursuant to PRIA.

For example, the proposed RMP dictates that desired plant community objectives for various types of wildlife habitat will affect the majority of the land in all allotments. The RMP itself also determines the number of AUMs which are unsuitable for livestock grazing in each allotment, even though an on the ground analysis has not been conducted. The proposed RMP predetermines the ecological condition class of each allotment based on data that is outdated. Wildlife management objectives have been set for nearly all riparian areas and reservoirs. The RMP habitat objectives necessarily means that less livestock can be grazed. These objectives must be included in individual AMPs without the consultation, cooperation and coordination required per PRIA.

THE PLAN VIOLATES BLM REGULATIONS REQUIRING DECISIONS BE MADE BASED ON MONITORING DATA

The regulations drafted pursuant to the FLPMA, the Public Rangelands Improvement Act (PRIA) and the Taylor Grazing Act (TGA) require that resource decisions be based on sound monitoring data. 43 C.F.R. § 4110.3 et seq. For the categories listed below, the BLM does not include, on the record, the data justifying its decisions.

A. Reduction in AUMs

The BLM Plan states that there will be a 35% reduction in livestock AUMs. Unfortunately, the reduction is even greater than the BLM states because although the current grazing preference is for 243,240 livestock AUMs, 41,689 of these AUMs are in suspended non-use. Therefore, the active preference in the Resource Area on BLM lands is 201,491 AUMs. There are an additional 55,904 AUMs available on state and private lands. Therefore, the total AUMs available to livestock operators currently is 157,155, and if the suspended AUMs were activated, the total AUMs would be 199,044 AUMs. See Table 3-2, Appendix 3. In addition, the original active preference on BLM lands in the Grass Creek Resource Area was 184,000 AUMs. Livestock operators in the Grass Creek Resource Area have already been cut by twenty-two percent (22%) (from 184,000 AUMs to 101,491 AUMs). The BLM Plan now calls for a reduction in BLM AUMs to 66,000 by the year 2005. Therefore, the BLM proposed RMP actually allows a sixty-four percent (64%) decline from the original BLM preference and a thirty-five percent (35%) decline from the current active preference.

Currently there are also 55,904 state and private AUMs. Pursuant to the Plan, these state and private AUMs will be cut by 19,534 AUMs or 35%, to 36,370 AUMs. The BLM lacks current valid data to justify these cuts.

B. Utilization

Utilization levels are not a scientifically valid method upon which to base range management decisions reducing AUMs. Specifically utilization levels do not establish the resource trend on an allotment; grazing reductions must be based on resource conditions or trend data that show a deterioration over time. Once trend is established, utilization data can be used to determine how utilization has affected trend but, again, it is inappropriate to use utilization data as a soul basis for cuts to livestock AUMs. Please see the article attached as Appendix 1 by Lee Sharp, Ken Sanders and Neil Rindey entitled "Management Decisions Based on Utilization - Is It Really Management?"

C. Suitability

The BLM lacks the data necessary to determine which allotments are and are not suitable for livestock grazing. For example, on page 176, the Plan states that 43,850 AUMs would be eliminated based on BLM "suitability criteria."[14]

With regard to the Hillberry/Hart allotments, the table on page 251 shows that the suitable AUMs in all three (3) allotments

[14] The range management profession outside of the BLM has strongly objected to these suitability criteria since the 1980's. The BLM itself determined, in 1984, that these suitability criteria were based on failed technology. As a result, the BLM itself stopped using this suitability method in 1984.

are significantly below the total authorized grazing use. Hillberry Ranches and Tim Hart have used the Freedom of Information Act (FOIA) to obtain all BLM information on these three (3) allotments. The BLM file contains no field data establishing suitable AUMs. However, the proposed RMP's suitability criteria demands that their allotments suffer further reductions in livestock grazing. The bottom line is that the proposed RMP is being used to arbitrarily cut AUMs without scientific data supporting those cuts.

D. Trend Data

As stated above the proposed RMP would mandate reductions in most, if not all, allotments even thought there is no current data which establishes downward trend due to livestock grazing. On page 297, the Plan defines trend data as the direction of change in the condition or health of the range usually gauged in relation to its natural potential and determined by observation over a period of time. This definition is inaccurate. Trend data indicates the condition or health of the range as determined by observation over a period of time; attempting to attach trend in relation to "natural potential" is incorrect.

With respect to the allotments utilized by Hillberry Ranches and Tim Hart, the BLM has no trend data. The Table on 3-7 shows no transects for trend data on any of their allotments. In addition, the allotment files obtained from the BLM under FOIA contain no trend data. Therefore, the BLM has no basis for determining whether these three (3) allotments are in a static, upward or

downward trend. Without such information, any cuts to the AUMs on these allotments can only be labeled as arbitrary and capricious.

On page 257, Table 3-7, the BLM purports to have use pattern mapping data for the Buffalo Creek allotment. Use pattern mapping is not a sufficient basis on which to base AUM reductions.

Finally on the Buffalo Creek allotment, there is a reservoir which washed out several years ago. Hillberry Ranches and Tim Hart have repeatedly requested that the BLM repair this reservoir; the BLM has declined to do so. Hillberry Cattle Company has also proposed to fix this reservoir in order to improve the livestock distribution on the allotment. However, the BLM does not appear willing to allow Hillberry Cattle Company or Tim Hart to utilize the AUMs made available even if the land owner spends the necessary money to fix the reservoir.

Since there is no adequate trend data as required by BLM regulations, the AUM reductions mandated by this RMP should be eliminated; any reductions must be based on proper scientific evaluation, on an allotment by allotment basis.

E. Ecological Class

Table 3-6 purports to establish ecological class and acreage on the public land in each allotment. This information is apparently based on a study by the Soil Conservation Service (SCS), which is not reproduced in this document, completed in the 1970s.

The range conditions on the majority of these allotments, including the Prospect Commons, Buffalo Creek and Crow Creek allotments, have changed considerably since this data was gathered.

Therefore, the validity of Table 2-4 is questionable given the passage of time. As with most of the other information presented in Appendix 3, the ecological condition of each allotment should be set in consultation, cooperation and coordination with the affected permittees and based on current data.

F. Desired Plant Communities

In addition to the comments above regarding DPCs, the imposition of this requirement violates the BLM mandate for adequate data upon which to base a decision. The Hillberry/Hart permittees are concerned that the DPCs set for their allotments are not achievable or attainable. Specifically, it will take detailed scientific monitoring to determine whether these DPCs are realistically achievable. If they are not, the permittees should not be forced to manage their allotments for a condition that cannot be met. Again, adequate monitoring is needed before the DPCs are implemented to determine if the BLM's goals can even be met.

G. Erosion

Interested and affected parties cannot adequately comment on the erosion portion of the preferred alternative because the data which serves as the basis for Table 8 on page 126 is not presented in this Plan. Without the opportunity to review the methodology used to obtain the data regarding erosion, there is no opportunity for meaningful comment which violates the planning regulations. It is also interesting to note that Table 8 on page 126 identifies livestock grazing as a relatively minor source of erosion with only

temporary effects. However, a clear implication from page 194 is that livestock grazing will be cut based on erosion concerns. It is further interesting to note that the Plan has arbitrarily failed to acknowledge that wildlife can also cause erosion because wildlife related erosion is not addressed.

M. Actual Use

Throughout the Plan, the BLM makes repeated references to the fact that permittees often do not utilize their full authorized use. See, for example Table 3-2, Table 3-5 and the discussion of the preferred alternative in Chapter 4. The clear inference of these references are that since livestock operators do not always use their full authorized use, a reduction in use does not significantly harm them. This inference is incorrect. First, the BLM has chosen the years 1987 through 1991 and the years 1976 through 1980 to determine average actual use. Both of these periods were years of prolonged drought, therefore during these years, livestock operators were running less cattle and removing them early in order to protect the range resource. It is unconscionable for the BLM to use their good stewardship as the basis to justify cuts in their AUMs.

Hillberry Ranches and Tim Hart have often reduced their livestock numbers or removed their animals early out of concern for the resource. However, this does not mean that they do not wish to fully utilize the authorized preference when range conditions allow. If livestock reductions can be justified by the fact that average actual use has been less than authorized use, permittees

will have an incentive to utilize all of their AUMs, even during years when they feel it is not in the best interest of the resource or their operations.

Given that it is a violation of the terms and conditions of the permit for permittees to use more than their authorized use in wet years to make up for AUMs not used in dry years, the average actual use of past years will never equal authorized use. Therefore, lowering authorized AUMs on an average actual use basis is a never ending spiral. The use of authorized grazing as compared to actual use is an arbitrary and capricious basis in which to justify the currently proposed cuts in AUMs.

THE PLAN ADDITIONALLY VIOLATES BLM PLANNING REGULATIONS

The statutes governing the BLM's planning process are the TGA, FRIA and FLPMA. The planning process is also governed by the regulations which were adopted pursuant to these statutes. These statutes provide no authority to manage the Grass Creek Resource Area under the vaguely defined principals of "ecosystem management" or "biodiversity." Congress has never defined these terms nor has it authorized the BLM to manage pursuant to those principals. Page 8 states "biological diversity is defined as a variety of life and its processes, although vastly complex it concludes some measurable distinctions like genetic differences within and among species, species variations, associations of species with each other and their environments, and the patterns and linkages of those biological communities across geographical areas.' The BLM then states that the BLM policy requires that habitats being managed

with emphasis on biological communities and natural systems to ensure self sustained populations and an abundance and diversity of wildlife, fish and plant resources on the public lands.

The discussion of ecosystem management on page 8 is nearly as bad as that of biodiversity. The BLM claims that ecosystem management is consistent with FLPMA. However the BLM cannot manage the federal lands based on some policy that they perceive to be similar to FLPMA.[15]

It is Hillberry Ranches and Tim Hart's belief that the biodiversity and ecosystem system management sections of this Plan are an attempt by the BLM to implement the proposed regulations know as Rangeland Reform '94. Because the Rangeland Reform regulations do not take effect until July, this action is ill advised. If Rangeland Reform is not successfully challenged in Court, it may be changed in Congress. The BLM simply cannot implement a set of regulations that are not in effect and subject to change.

There are several specific areas in which the landowner/permittee believe that BLM is implementing Rangeland Reform '94. For example, utilization is defined in the current BLM regulations as 'the percentage of forage that has been consumed by livestock during a specified period and the livestock grazing utilization pattern on the allotment.' 43 C.F.R. § 4100-5. In contrast, the definition for utilization in the proposed RMP

[15] The use of ecosystem management and biodiversity also violates multiple use.

includes use from all sources, not just livestock. This is the definition found in Rangeland Reform regulations.

Second, on page 132, the proposed RMP discusses riparian areas in terms of "properly functioning, functioning-at-risk and nonfunctioning." This vaguely defined concept of riparian management is also part of the Rangeland Reform regulations. There is no authority to mange riparian areas in this manner. The management criteria in Rangeland Reform must be eliminated from the proposed RMP.

THE PLAN VIOLATES THE ADMINISTRATIVE PROCEDURES ACT (APA)

The Administrative Procedures Act,(APA) 5 U.S.C. § 501 et seq., provides that administrative decisions must be made on the record and must be available for public comment. However, there are several aspects of the Plan which represent conclusions drawn from material that is not available for comment. For example, the ecological inventory data from the Soil Conservation Service (SCS) is not part of the current administrative record. In addition, it is unlikely that that material was gathered under the procedural guidelines and mandates for public comment of the BLM because the Soil Conservation Service is not bound by the same federal planning statutes. Because there was no opportunity for public comment on this data, it cannot be used as a basis for BLM's decisions.

Second, the proposed RMP will attempt to meet the Wyoming Game and Fish Department wildlife habitat objectives. Again, these habitat objectives were not developed pursuant to the planning criteria that the BLM must follow. Therefore, the conclusions

themselves, as well as the methodology for reaching those conclusions, are not available for public comment.

Third, administrative decisions will be overturned if they are arbitrary and capricious or not in accordance with law. 5 U.S.C. § 706(2)(a) For example, as stated above, forcing utilization standards on livestock in favor of wildlife is arbitrary and capricious and not in accordance with law.

Another example appears on page 254 of the proposed Plan which states "if livestock will be removed from the area during a growing season, any regrowth will not be measured." Since the regrowth of new plants during the growing season serves to decrease the utilization, the failure to consider this regrowth in utilization standards is arbitrary and capricious.

THE PLAN VIOLATES THE NATIONAL ENVIRONMENTAL POLICY ACT

The proposed RMP violates the National Environmental Policy Act, (NEPA) 42 U.S.C. § 4221 for failure to consider a full range of alternatives, for failure to include a true "no action" alternative and for failure to include important considerations effecting socioeconomic stability and the custom and culture of the area. First, the BLM regulations at 43 C.F.R. § 1610.4-5 state that "one alternative shall be for no action which means continuation of present level or systems of resource use." The RMP identifies Alternative A as the no action alternative. However, there are many provisions of Alternative A which clearly indicate that it is not a no action alternative. Most notably Alternative A will decrease AUMs from the current authorized use of 130,926 to

111,450. This does not maintain the current level of resource use by the livestock industry and therefore cannot be considered a no action alternative. In fact, Alternative A is more similar to the preferred Alternative than it is to the current level of resource uses.

There are other examples of how Alternative A does not represent a no action alternative. Alternative A calls for a decrease in the level of oil and gas production. The same is true for hazardous materials and lands and realty management sections. Under the livestock management section, Alternative A would limit utilization of salt desert shrub and salt bottom plant communities to 30% to 50%. In other plant communities, Alternative A would also limit the grazing to 30% to 50%. These utilization standards mean that livestock grazing will be eliminated once the utilization from all types of usage or destruction has reached these amounts. This is significantly different from the status quo.

On page 43, Alternative A would restrict livestock grazing from May 1 to June 30 on 44,000 acres of winter elk habitat on 23 grazing allotments. Additionally, domestic sheep grazing would be restricted on 121,000 acres of pronghorn habitat in 64 allotments. The desired plant community objectives are the same in Alternative A as in the preferred alternative, showing that Alternative A is not the status quo. The same problem occurs in the wild horse management area. On page 70, Alternative A adopts the 1983 Wyoming Game and Fish Department's strategic plan for wildlife habitats. The above mentioned examples are by no means exclusive however they

suffice to show that the Plan is legally deficient as it does not contain a true no action alternative as required by NEPA and the applicable BLM planning regulations.

Second, NEPA, 42 U.S.C. § 4321 et seq. and FLPMA require that land use plans consider a full range of management alternatives. *California v. Bergland*, 513 F.Supp. 105 (E.D. California 1979), rev. in part, aff'd in part sub nom, *California v. Block*, 690 F.2d 753 (9th Cir. 1982). The BLM has not considered a full range of alternatives; the four alternatives are much more similar than they are different. For example, the access provisions on page 29 for Alternatives A, B and C are identical to that of the preferred alternative. On page 26, each alternative is required to be consistent with wildlife objectives. See also page 37. Each of the alternatives focuses on biodiversity and ecosystem management. Page 41 of Alternative A requires periodic rest of the elk winter area as do the other alternatives.

Most of the restrictions on livestock grazing are the same or practically the same in each alternative. The only difference between alternatives is a slight variation in the level that livestock grazing AUMs will be cut. Each alternative is identical with respect to noxious weeds. Again this list of examples is by no means exhaustive however, it serves to illustrate the point that the BLM has not considered a full range of alternatives.

Third, NEPA requires the agencies to "preserve important historical, cultural, and natural aspects of our national heritage." 42 U.S.C. § 4331(b)(4). Livestock grazing is an

important historic and cultural aspect of the Grass Creek Resource Area. However, rather than attempting to protect and preserve this important historic and cultural aspect of the region, the BLM is causing harm by subordinating this use to other objectives that may ultimately lead to a demise of many of the area's ranches. For example, on page 193, the Plan projects an increase in recreation and discusses some of the management objectives to achieve this increase. The BLM has not assessed what effect this may have on the livestock industry. For example, as recreation increases it usually follows that more houses, Mini-Marts and other tourist servicing structures will be built. The land of ranchers who can no longer make a living ranching due to the BLM's management restrictions will be converted into tourism servicing developments.

In addition, the conversion of ranch land will have an adverse affect on wildlife habitat. For example, due to the restrictions some ranchers will go out of business and sell their property to developers or will attempt to mitigate their loss by fencing their private and state lands and managing them more intensively for livestock grazing.[11] The fences on the private land may affect the migration of wildlife. In addition, because they have lost their traditional grazing AUMs, ranchers will be forced to provide less

[11] On page 119, the BLM notes that the majority of the elk hunting in the area is based on private land. However, if the private lands are fenced away from the BLM and managed more intensively for livestock production or are sold to developers, this elk hunting will substantially lessen.

wildlife habitat on their newly fenced private lands in order to make them more productive for livestock.[15]

Table V on page 106 notes that the first cattle rancher in the region was John D. Woodruff who settled on Elk Creek in 1871. The first irrigation ditch was built in the 1880s. The federal government is currently in the process of purchasing some of the last remaining ranches in the Jackson Hole area to preserve the area's ranching tradition. This action demonstrates that livestock grazing is a historic use. The Grass Creek Resource Area should recognize this historic and cultural importance and protect it as required to do under NEPA and the Taylor Grazing Act.

Fourth, the RMP does not consider socioeconomics as required by NEPA. The Plan the purports to increase tourism by 46%, however the Plan provides no supporting documentation to support these assumptions. On the other hand, it is certain that livestock grazing and the resulting economic contribution from that industry will be seriously curtailed.

The proposed RMP also anticipates a reduction in full time jobs associated with the natural resource industries. However, the BLM assumes that those full time jobs will be replaced by recreation and wildlife generated jobs. The BLM fails to address

[15] For example, Hillberry Ranches and Tin Hart are nearly certain to receive significant cuts on their "incentive" allotment. (See discussion infra). To mitigate this, Hillberry Ranches will consider fencing their private lands. Once these private lands and state lands are fenced away from the BLM land, Hillberry Cattle Company will be forced to convert prime sage grouse, antelope and deer habitats into pastures that are managed exclusively for livestock.

the fact that recreation associated jobs usually pay less than natural resource based jobs. For example, a job at a Mini-Mart does not pay as well as a job associated with the mineral, timber or livestock industries. Therefore, even if full time employment were to remain the same, the average wage may well decrease.

On page 180, the Plan discusses various contributions to the local economy. However, since none of the alternatives truly represent the status quo, there is no economic analysis of the contributions to the economy from the natural resource industries and specifically the livestock industry if the status quo were maintained. Each livestock AUM is worth $32.43 in direct income and $44.68 in indirect income for a total of $77.11 per AUM.[16] Therefore, the economic contribution of the livestock industry, if analyzed under a true status quo alternative, would be significantly greater than that which is anticipated in the preferred alternative.[17]

Finally, the DEIS and RMP fail to predict the population affects on the community. For example, the individuals who drill for gas, hauls logs and run ranches are not the same individuals

[16] See letter from Joseph T. Vessels circulating background information used in the Grass Creek Resource Management Plan to estimate socioeconomic affects.

[17] The analysis of socioeconomics impacts contends that of the 12.94 million dollars of economic activity generated by the grazing industry that only 44% or 5.8 million dollars is derived from livestock grazing on federal lands. However, this is confusing because out of the 187,836 total AUMs of grazing in the area, 130,000 of those AUMs are based on BLM lands. This equals 78% of the AUMs in the resource area. It appears unreasonable that 78% of the AUMs would only contribute 44% of the AUM based economic contribution. Please clarify these statistics.

who will take the jobs in the service industry. Therefore, the result of the Plan is that many of the residents who make up the existing employment base will leave in search of jobs in their occupation.

Because of the BLM's failure to develop a true no action alternative, the failure to analyze a full range of alternatives and the failure to assess the effects of the Plan on socioeconomics and culture, this Plan is legally deficient and can be successfully challenged in Court.

THE DESIGNATION OF THE FIFTEEN MILE WATERSHED ACEC AND ADDITIONAL WILD HORSE HERD MANAGEMENT AREAS DO NOT COMPLY WITH BLM REGULATIONS

Pursuant to the proposed RMP, the northern portions of the Buffalo Creek allotment and one state land section within the Buffalo Creek allotment will be included in the Fifteen Mile Watershed Area of Critical Environmental Concern (ACEC). The BLM regulations provide several criteria for an area to be eligible for ACEC designation, however the portions of the Buffalo Creek allotment included in this ACEC do not meet this criteria. 43 C.F.R. § 1610.7-2 requires that data shall be collected and analyzed to determine whether there are areas containing resource value systems, processes or hazards eligible for designation as an ACEC. In order to be an ACEC, the BLM must consider (1) relevance; the area shall be present a significant historical, cultural or scenic value, fish or wildlife resource or other natural system, process or natural hazard and (2) importance; the above described value, resource, system, process or hazard shall have substantial

significance or value. This generally requires qualities of more than local significance and special worth, consequence, mean, distinctiveness, or cause for concern.

The Fifteen Mile Watershed ACEC may have some of the above mentioned resources, however it does not have importance of more than local significance. Even if other portions of the proposed ACEC meet the criteria for importance, the portions of the Buffalo Creek allotment that are currently within the ACEC do not. In addition, a significant portion of the Buffalo Creek allotment[17] designated as an ACEC is state land and is therefore ineligible. The balance of the Fifteen Mile Creek Watershed ACEC should be reassessed as to whether it meets the importance criteria in the BLM planning regulations.

With regard to wild horse herd management, the preferred alternative on page 66, proposes a thirty-seven percent (37%) increase in size. That seems inequitable given that livestock grazing is being decreased by thirty-five percent (35%). The RMP at page 66, also states that the horse area would be managed for at least seventy (70) and no greater than one hundred sixty (160) mature animals. Increasing the wild horse herd population above to numbers that existed in 1971 is a violation of the Wild Horse and Burro Act. Further, expanding the herd into areas that did not

[17] Please refer to the ACEC map in the proposed RMP. Since the boundaries are close, it is possible that the Buffalo Creek allotment is not included as part of the ACEC. However, based on the shaded areas of the maps, they appear to overlap.

contain horses in 1971 is also a violation of the 1971 Wild Horse and Burro Act.

Finally, given that wild horses can be very hard on the land and riparian areas, the BLM must answer the following questions. Has the BLM considered the effects of the wild horse herd on the ACEC objectives? If the ACEC objectives are not met, will the BLM reduce the horse herd? In addition, will the BLM reduce the horse numbers if the utilization standards are not met? See Map 19. What steps will the BLM take to protect private land? Finally, does the BLM have the budget to control wild horses when they increase in size? Because of the adverse affect that the increase in wild horse area and numbers can have on private property, private property rights and investment backed expectations, the BLM should perform a takings implication assessment pursuant to Executive Order 12630 regarding possible trespass of wild horses onto private land.

MISCELLANEOUS CONCERNS WITH THE PROPOSED PLAN

1. On page 31, the Plan states that applications for desert land entry on public lands would not be considered and that public lands having agricultural potential and water would be considered for disposal by sale or exchange only. This provision is invalid because it violates the desert land entry statutes. The desert land entry statutes allow homestead entry to be made on arid lands where the entryman can cause the lands to be irrigated. All lands that fit the desert land entry statute criteria are available for entry by an eligible entryman, unless formally withdrawn from

desert entry. The withdrawal of land from entry requires public notice, publication in the Federal Register and protection of existing rights. Unless this procedure is completed, this provision in the proposed Plan is invalid.

2. In its discussion of noxious weeds, the Plan fails to note that the National Undesirable Plant Management Act (NUPMA) requires federal agencies to enter into Memorandums of Understanding (MOUs) with state noxious weed management agencies to control noxious weeds according to state law. Therefore, this section should be written to follow state noxious weed law.

3. Map 7 in the proposed RMP depicts right-of-way concentration areas and right-of-way avoidance areas. Hillberry Cattle Company is concerned that the map depicts a right-of-way concentration area which crosses their private property. The BLM is hereby put on notice that the right-of-way concentration area depicted on the map to cover private lands, contains no public right-of-ways. Additionally, the BLM has not consulted with the land owners regarding the proposed right-of-way concentration areas. Therefore, Hillberry Cattle Company hereby requests the BLM to complete a takings implication assessment pursuant to Executive Order 12630 in all areas where right-of-way concentration areas cross or come near private land.

4. The proposed RMP discusses the possibility of transplanting threatened and endangered species. RMP at 53. Hillberry Cattle Company feels that the proposed RMP already makes their livestock operation subordinate to other multiple uses and

that if endangered or threatened species are transported into the area, they will be subordinate to additional objectives. Hillberry Cattle Company would like to go on record as opposing any transplanting of threatened or endangered plants or animals into areas affecting their allotment or their private lands. In the event that the BLM attempts to introduce endangered or threatened species into the area, the affected landowners, permittees and local governments must be compensated pursuant to applicable law.

5. The preferred alternative discusses Visible Resource Management areas (VRMs) on page 62, stating that the BLM shall maintain or improve scenic values throughout the planning area. Map 19 depicts three (3) different resource management areas; however, neither the map nor the preferred alternative indicate differences between the three (3) classes. Hillberry Cattle Company and Tim Hart appear to be effected by VRM class 3 and VRM class 4. However, the Plan does not indicate how these individuals may be effected nor is there any indication how the VRMs affect livestock grazing. The BLM should expand their discussion of the VRM since they encompass the entire resource area so that interested individuals can assess if and how they are affected.

OTHER COMMENTS ADOPTED

The Wyoming State Grazing Board has submitted comments on the proposed RMP and draft EIS for the Grass Creek Planning Resource Area. Hillberry Cattle Company and Tim Hart adopt those comments and the issues raised therein as if they were specifically restated in these comments.

The County governments effected by the draft EIS and proposed RMP have submitted comments. Hillberry Cattle Company and Tim Hart adopt those comments and the issues raised therein as if they were specifically stated in these comments.

REQUEST FOR RELIEF

Hillberry Cattle Company and Tim Hart respectfully request that the proposed RMP and the draft EIS be rewritten to correct the technical and legal deficiencies described above. Additionally, they request that a Takings Implication Assessment (TIA) as described by Executive Order 12630 be completed assessing the effects of this Plan on their private property, private property rights and investment backed expectations.

Sincerely,

Frank J. Falso
SOND-FALSO LAW OFFICES, P.C.

FJF/tyl

xc: Hillberry Cattle Company
Tim Hart

[Included with this letter were pages from the *RANGELANDS 16(1), February 1994*, annotated "EXHIBIT A"–ED.]

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

566

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

566.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

[redacted]

RECEIVED
MAY - 9 1995
BUREAU OF LAND MANAGEMENT
Worland, Wyoming

567

To BLM C/O Bob Ross
Grass Creek Area Draft RIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-6195

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of knowledgeable community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

567.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object to the lack of detailed descriptions for restrictions.

I object to the discussion of threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and Prairie dog, Black-Footed Ferret inferences.

RECEIVED
MAY 17 1995
BUREAU OF LAND MANAGEMENT

568

April 23, 1995

Bob Ross
BLM Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119
U.S.A.

Dear Mr. Ross:

I am writing in reference to the BLM's draft Grass Creek Management Plan.

I find the BLM's proposal to open wilderness study areas to hard rock minerals mining, motorized vehicle use, and oil and gas development to be ill advised. I feel that the BLM should manage more of the Resource Area for semi-primitive, non-motorized recreation activities. The areas of critical environmental concern should be off limits to oil and gas leasing and development.

Furthermore, though I am in disagreement with your determination regarding the eligibility of the South Fork of Owl Creek for National Wild and Scenic River status this area merits protection from oil, gas, and road development regardless of its status.

The allowance of carte blanche oil and gas leasing on all legally available land throughout the Resource Area is both clearly excessive and in direct conflict with your own multiple use mandate.

The final plan should focus more attention in the betterment of rangeland and riparian zones as well as a greater emphasis on fish and game management.

It takes no genius to see that the opportunity to wisely manage a vast area of natural resources is an increasingly rare one. Why turn this part of our wonderful Wyoming into that much closer a place to everywhere else, history strongly suggests that the road your draft management plan takes is a one way rain. Isn't it worth another look?

RESPECTFULLY YOURS,

John R Hay

569

I strongly object to the alternative plan on the BLM. I do not want Babbit in charge of our lifes and resources. We love our land and wish to keep it-not give into government plan for its use.

/s/ Kay B. Hopkin
1229 Rd 11
Lovell Wyo
82431

5-6-95

RECEIVED
MAY 11 1995
BUREAU OF LAND MANAGEMENT

570

Friends of Wild Wyoming Deserts
6361 Highway 26
Dubois, Wyoming 82513
May 6, 1995

Mr. Bob Ross
BLM Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

Thank you for the opportunity to comment on the **Resource Management Plan/Draft Environmental Impact Statement for the Grass Creek Resource Area.** In general, the Friends of Wild Wyoming Deserts support Alternative C. As an organization of hunters, recreationists, and scientists, we favor maximum protection for continued public enjoyment and use of the wildlife and wildlands in the Grass Creek Resource Area.

Specifically, we advocate the management actions in Alternative C that would meet the Wyoming Game and Fish Department wildlife objectives and "allow the expansion of wildlife and fish into high potential habitats." We request utmost protection for all, not just 'crucial', winter range for antelope, deer, elk, moose, and bighorn sheep.

Based on years of field inventory, we have seen that the rangelands and riparian zones in the Resource Area show signs of historic and chronic overuse by grazing ungulates. Pedistalled plants, eroding soils, deeply-cut stream courses with crumbling banks, loss of riparian vegetation, an abundance less-desirable 'increaser' forage species, decadent sagebrush stands, and the nearly complete elimination of crypto-biotic soil indicate depleted range condition across much of the Resource Area. BLM must work with local grazing leasees and the Wyoming Game and Fish Department to correct the past over-use by ungulate species and improve rangelands and riparian zones. Much work has been done in recent years to demonstrate that conscientious, sustainable range management can benefit the leasees—through higher weight gain to their stock, and support healthier and higher populations of wildlife and fish. BLM must designate more funding and staff power to research and improve range conditions in the Resource Area. Additionally, if it has not been done already, detailed study should be made of the effects of the range pitting in the Fifteenmile country and beyond. Has the pitting ultimately improved or harmed species composition and soil stability in the area? Considering the effort initially spent to pit this vast area, conclusive research should follow now to assess the repercussions.

570.2

2

We heartily support designation of Fifteenmile Creek, Meeteetse Draw, and Upper Owl Creek Areas of Critical Environmental Concern. Because of the unique wildlife, scenery, and cultural values in these areas, we urge BLM to withdraw all three from oil and gas leasing and mineral development. If not withdrawn, lease stipulations may limit disturbance of crucial game ranges or cultural sites during the initial drilling phase, but the new roads, pipelines, and maintenance activities in years following will surely compromise the integrity of these areas. For the same reason, the Wilderness Study Areas, and the additional acreage proposed in the Citizen's Wilderness Proposal for Wyoming BLM Lands, should also be exempted from oil and gas leasing and mineral development. These areas contain beautiful open landscapes, quiet habitats for game, scientifically-important fossils and ecological community types, and fragile, erosive soils. Further development or roading will not serve them well. Regardless of Congressional action, these areas should be protected and used in ways that will enhance, rather than damage, these special values for coming generations.

We support BLM's efforts to provide protection from development to Legend Rock Petroglyph site and public lands along the Bighorn River. Both locations are fragile and important.

We must disagree with BLM's assessment that the South Fork of Owl Creek is not eligible for inclusion in the National Wild and Scenic Rivers System. It is a scenic corridor with outstanding wildlife and recreation values, most deserving of federal recognition and protection from development.

The National Natural Landmark candidates—Gooseberry Creek Badlands, East Ridge-Fifteenmile Creek Badlands, and Tatman Mountain—identified by the National Park Service as having nationally significant ecological and geological features should be designated as NNLs, and protected with VRM II visual resource management classifications. They should be withdrawn from oil and gas leasing and mineral development, and protected and used to their full value as paleontologic and geologic treasures.

We also support the establishment of four Special Recreation Management Areas—Absaroka Foothills, Badlands, Bighorn River, and Red Canyon Creek. These areas should be removed from oil and gas leasing and mineral development.

From a scientific standpoint, we find that the Environmental Consequences analysis of the Draft EIS is gravely deficient. The assessment of environmental consequences of the analyzed alternatives is largely a description of changes in program accomplishment, rather than a disclosure of the effects each alternative will have on the physical

570.3

environment. BLM's analyses determine effects to resource program targets and local economics, rather than effects to physical resources such as air and water quality, biological components, or ecosystems. For example, although the Affected Environment section of the document notes that airborne dust, "relatively high levels of hydrogen sulfide", and sulfur dioxide are pollutants associated with oil and gas fields in this part of Wyoming, the Environmental Consequences section gives no description of the level of air pollution associated with the potential development scenarios described. How will the emissions affect air quality in Bobcat Draw, in Worland, in the Class I alcished of the Cloud Peak Wilderness? Specifically, how will soils, rare plants, biological diversity, water quality for livestock, and other physical factors be affected in each alternative analyzed? The Draft EIS does not contain enough information for the public to assess the true and total resource costs of each alternative.

The Draft EIS states that forests in the Resource Area "need to be harvested over time to maintain a healthy, vigorous forest." To the contrary, modern timbering practices result in a number of unhealthy impacts to the forest, including soil compaction, removal of nutrients from the nutrient cycle, increased soil erosion and stream siltation, and degradation and fragmentation of fish and wildlife habitat. How has BLM judged that leaving 10 percent of the forest in old-growth stands is a healthy level? Would 20 or 40 percent be healthier? How will BLM maintain the stated level of old-growth in the event of a wildfire in the remaining stands? Plainly, there are too many impacts of questionable environmental value to support the timber harvesting levels proposed in the RMP.

Overall, we believe the RMP places too much emphasis on the production of timber, minerals, and oil and gas at the expense of other valued public resources. As the tourism sector of Wyoming's economy grows, and as remote, undeveloped recreation opportunities become more scarce, BLM should not be facilitating further roading and development in the Grass Creek Resource Area. With the increasing human population pressures that the future is sure to hold, undisturbed game ranges, clean water and healthy forages for livestock, places to camp in solitude, or open country to ride quietly across on a horse will only grow in importance. BLM must consider seriously its role as a land steward, and revise its Resource Management Plan to reflect this role and better protect public resources.

Most sincerely,

Lynn Kinter

Lynn Kinter
Director

571

RECEIVED
MAY 12 1995
BUREAU OF LAND MANAGEMENT

To BLM C/O Bob Ross
Grass Creek Area Draft EIS
P.O Box 119
Worland Wy 82401-0119
Fax (307) 347-4198

I object to the significant financial impacts to businesses, individuals (and consequently to the tax base), and the effected counties and communities due to restrictions proposed within all of the alternatives, and recommend that a new preferred alternative be created with the help of the affected community individuals and representatives from grazing, recreation, oil and gas and minerals industry, timber and local and state governments.

I appreciate the opportunity to contribute to the very important Grass Creek Area Environmental Impact Statement. Please find my comments below.

I object to the reduction of Grazing AUMs proposed in the Alternatives. Real, current scientific data should be used to make management decisions on each allotment. Targets should be clearly established and stated.

I object to the expansion of "Wild Horse Management" areas. I recommend eliminating all "Wild Horse Management" areas in the Grass Creek area RMP. Return all wild animal management to the State Game and Fish, and return all managed animal production to the Private sector.

I object to the data collection procedures cited for AUM utilization, and suitability. This should be completely redone.

I object to the small amount of land considered for suburban expansion.

I object to the lack of discussion about impacts to the value of private, state and county lands by the Various alternatives. Especially those imbedded with the BLM Administered lands.

I object to restrictions that hamper the current primary businesses and individuals who use federally administered lands to are generate income and support our communities through taxes.

I object to the severe and undue number and level of restrictions on Surface Disturbance in all of the alternatives. Not enough emphasis has been placed on new technology and new information to mitigate and reclaim any impacts.

I object to the bias for recreation disturbance and the bias against minerals, grazing and recreation.

I object to the proposed blanket restrictions contained in Off-Road Vehicle Management.

571.2

I object to the small consideration given to the economic impacts to businesses and also tax bases. Beneficial impacts of businesses should also be factored in.

I object the lack of detailed descriptions for restrictions.

I object to the discussion of Threatened, endangered and candidate wildlife species, specifically unsubstantiated Gray Wolf inferences, and prairie dog- Black-footed ferret inferences.

Steve Sheehy
Casper, Wy.

RECEIVED
MAY 15 1995
BUREAU OF LAND MANAGEMENT

572

May 8, 1995

Douglas L. Malvey
Illinois State Geological Survey
307 E. Healey, Apartment #2
Champaign, Il 61820

Bob Ross, Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119

RE: Grass Creek Resource Area Resource Management Plan, Draft Environmental Impact Statement

Dear Mr. Ross:

This letter addresses my concerns relating to the Draft Environmental Impact Statement (DEIS) for the Grass Creek Resource Area. Overall, I find the DEIS to be well thought out and organized. I do have a few concern though with some of the content and lack thereof.

Although the DEIS adequately addresses and describes the future management options for the 968,000 acres of public land surface and 1,171,000 acres of federal mineral estate administered by the Bureau of Land Management, I feel that it falls short of addressing erosion and sedimentation concerns and completely ignores wetland issues. Finally, there is no mention of costs for implementing plans or programs or those associated with losing access to previously accessible areas.

On page 65 of the DEIS, it is stated that, "to reduce the amount of nonpoint source pollution entering waterways, pollution prevention plans would be developed for actions that qualify under the Wyoming Storm Water Discharge Program." No where else in the DEIS are possible solutions from this manual addressed. Numerous Best Management Practices (BMP), such as swales and sedimentation basins, are available to control the magnitude of present and future erosion in this region. Although dense stands of vegetation do somewhat control erosion, page 195 that the amount of erosion delivered to streams would be about 460,710 tons per year or a 2 percent decrease. In order to address vegetative management, one of your key resource management issues, larger reductions in erosion than this are needed.

572.2

On page 27 in Table 8 (Activities Affecting Soils), the main culprits of soil loss are addressed. I think the optimal solution to the erosion problem would be to reduce each of the major soil loss activities e.g., pipelines, exploratory wells, flowlines, bentonite mining, sand and gravel quarrying, and ORV usage as much as feasibly possible and then look to BMP solutions to control the remaining problem. This solution would not only address erosion and sedimentation and how it relates to vegetative management, but it would also address major stream water quality issues related to sediment and mentioned on page 131.

On page 171, it is stated that "within 5 years of seeding with native bunch grasses in the Pifteenmile Creek watershed, soil loss would be reduced by 50 percent in the seeded areas." I figure this to be a rather hopeful number. Erosion control using natural vegetation is limited to low flow velocities. With the nature of the slope and soil structure in this region, I would suspect the 50 percent control value will not be achieved.

I was particularly concerned about the impacts of erosion on wetlands in this area. I fail to see any mention of wetland issues except on page 195 where it states, "... wetland and riparian areas would receive less water..." Although it is hard to speculate how wetlands will be affected by the previous statement, I presume that wetlands will be impacted in some way by this project. I would like to see some information given on wetlands and their relationship to this project in the Final Environmental Impact Statement (FEIS).

Finally, I noticed no cost estimates were included for this DEIS. Even though there may not be that many direct costs related to the project, both direct and indirect costs should be addressed in the FEIS as well as any mitigation and control measures that are being considered for this project.

Although the DEIS is well laid out and organized, I think the issues I have mentioned should be addressed in the FEIS. I look forward to your comments and thanks for letting me comment.

Sincerely,

Douglas L. Mulvey

Douglas L. Mulvey
Civil Engineer

573

RECEIVED
MAY 1 8 1995
BUREAU OF LAND MANAGEMENT
WORLAND, WYOMING

Mr. Bob Ross, Team Leader
Bureau of Land Management
Worland District Office
P.O. Box 119
Worland, Wyoming 82401-0119

R.E. Grass Creek Resource Area Management Plan - D.E.I.S.

Dear Mr. Ross:

Management of our public lands and the unique quality of life found in the Grass Creek Resource Area are very important to the citizens of Wyoming and the Public. Therefore management of these lands must be flexible, founded on valid research, broadly considered, and provide for the maximum economic return for the Public.

The DEIS that is printed does not provide the consideration of sustaining the area at the present level of economic activity, custom, culture, livestock grazing, oil and gas development, recreation and timbering. Therefore I strongly urge you to reconsider the DEIS and provide the following in the final draft:

1. Allow increased timbering to utilize the remaining 80% mature forest timber, utilizing various methods including selective cutting that will allow the maximum monetary return to the Government and local communities, wildlife protection and other recreation .

2. Expand the use of fire treatment in the entire resource area to a minimum of the average fire treatment of the past 5-10 years. (approximately 2000 acres.)

3. Maintain the livestock grazing AUM'S as they are presently authorized for both the permitted sum's and actual use listed for 1990. Manage individual allotment on their own merits and not as a whole if there is a problem. Two state " In general resource conditions on public lands in the planning area, including range vegetation, watershed and wildlife habitat are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced or that would warrant elimination of livestock grazing on public lands." Therefore, the proposed reductions of AUM'S in NO MANAGEMENT I Every effort should be made to keep ranching viable in the resource area.

4. off road Vehicle management must have a more clearly defined designation and have a strong enforcement program for violations. The present plan does not address this issue!

5. A predator control program must be developed and implemented for the resource area which considers livestock, wildlife and human beings. The program must consider the safety of the multiple users, and if necessary the predators should be removed or eliminated. Without such a program it will be almost impossible to expand the bird populations in the resource area.

573.2

page 2, continued

6. The unreasonable restriction placed on the oil and gas industry in the proposed alternatives should be eliminated. It appears the Bureau of Land Management and Geological Survey Surface Use are not surprised on the restrictions are already covered by your standard lease agreement. These restrictions have an enormous economic impact on the economic stability of the area and affects revenues for the federal government, State of Wyoming and individual businesses and businesses of the four counties involved with this resource area. We need to provide jobs not eliminate them!

7. Considerations and concerns attempting to create new Wilderness without congressional consent is in violation of current laws! Attempting to do so by designation of the areas of Critical Environmental Concern (ACEC) should be stricken from the document.

8. There is no valid reason to expand the Wild Horse Range which is now covering the taxpayer over $13 million dollars to administer the program this year. Your management should be to maintain the herd at the level of 120 horses as stated in your 1988 summary. Building roads into the area that is of such special environmental concern and expanding the number of horses is not a wise use of money!

9. Adequate alternatives have not been provided. All of the alternatives comparing alternatives all read "None as Proposed." This is in violation of the National Environmental Policy Act(NEPA).

Mr. Ross, the DEIS as published is a clear attempt to reduce multiple use, particularly timbering, oil & gas development and livestock grazing. These are industries that are important economic revenues to the entire area and the Government. My last and agreed statement "the area is functioning rather well" is quoted from Mr. Ross it should be your responsibility to develop a plan that sustains the resource area, that provides for enhancement of all multiple uses and not the economic degregation and disaster that the proposed plan proposes.

Please provide details of how you propose to incorporate these suggestions into the plan and being some recommendations to the DEIS.

Respectfully,

574

RECEIVED
MAY 2 2 1995
BUREAU OF LAND MANAGEMENT

May 4, 1995

Bob Ross, Team Leader
P.O. Box 119
Worland, Wyoming 82401-0119

Dear Mr. Ross:

I am writing in comment of the Draft Environmental Impact Statement for the Grass Creek Resource Management Plan. I am currently a research assistant in the Environmental Engineering Department at the University of Illinois at Urbana-Champaign. I have traveled several times through northwest Wyoming, and I am very interested in the future management of resources in that area.

I found this Draft Environmental Impact Statement to be very well organized and easy to understand. The use of tables to compare alternative management actions and environmental consequences is very efficient and effective. These tables cut the amount of needed text and make a large amount of information easily accessible. Another important asset in this document is the numerous maps of the Grass Creek Planning Area. In addition to the comparison tables, these maps clarify the various land-use conditions under each of the proposed alternatives.

I would suggest including a topographic map of the planning area in this document. Throughout the Affected Environment and Environmental Consequences sections, references are made to highly trodable areas, high elevation areas, and scenic overlooks. The locations of these sites could be easily seen on a map that displayed elevation contours. A topographic map would enable the reader to see the location of the Absaroka Mountain Range as well as the deep canyon portion of Grass Creek. This map would also highlight inaccessible areas for mining and motorized recreation activities.

The DEIS explains the proposed management actions in extensive detail, but it does not describe how the current or proposed actions would be enforced. This document should discuss how limits will be imposed on surface-disturbance activities (off-road vehicle use, deforestation, mining, and construction). These limits, consisting of No Surface Occupancy, Controlled Surface Use, and Timing Limitations, are probably viable management techniques for these activities, but I feel that it would be difficult to effectively enforce these limitations throughout the entire 38 square mile planning area. The timing limitations seem especially difficult; prohibiting surface-disturbance activities during certain periods of the year due to wildlife considerations would have to be done on a case-by-case basis.

Enforcement of the off-road vehicle restrictions may also be troublesome. Violations of these restrictions would result in erosion problems, destruction of vegetation, and disturbance to wildlife habitats. Detection of off-road vehicle violations would probably not

574.2

be made until after this damage is done. The Environmental Consequences section may need to address this damage in its discussion of recreation impacts.

A third area of potential enforcement problems lies in the livestock grazing restrictions. The Preferred Alternative establishes maximum forage utilization percentages by livestock during the dormant and growing seasons. The actual percentage of forage consumed by livestock is probably difficult to determine in practice. Thus, this regulation may be troublesome or even impossible to enforce. It may also be difficult to limit or prevent livestock grazing in various winter and crucial winter ranges. The DEIS should explain how these regulations will be enforced throughout the study area.

After reading the description of water and soil impacts due to the Preferred Alternative, I feel that a water quality monitoring program should be established as part of the Resource Management Plan. This could include periodic sampling from the major streams in the study area. I believe that water quality monitoring is essential due to the negative impacts from erosion, livestock grazing, and produced water generated from mining operations. This monitoring program would assure that the produced water entering into a surface water body meets the standards of the National Pollution Discharge Elimination System. The DEIS did not specify how the produced water is currently monitored. This document should describe in more detail how each of the surface-water polluters listed above will be regulated.

My final concern with this DEIS lies in the economics behind the management plan. All of the Environmental Impact Statements I have read address the relative costs of each examined alternative. In this particular document, I feel that some discussion of costs should be included to assure the reader that each management plan can indeed be implemented. The DEIS does not explain any funding issues associated with protecting cultural and natural history resources, revegetation of harvested or thinned forestlands, or fencing wetland / riparian areas. Many other management actions are described in the Comparison of Alternatives table, but no explanation is made as to how these actions would be funded. I feel that this is an extremely important aspect that should be addressed in this document.

Overall, I feel that this DEIS is an extremely thorough and well-written document. The major resource management issues are addressed in detail, and I feel that the Preferred Alternative represents a healthy balance among environmental protection, recreational use, and natural resource utilization. I appreciate your consideration of my suggestions above, and I hope to visit the Grass Creek Resource Area the next time I travel through Wyoming.

Sincerely,

Chris English

Chris English

575

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET · SUITE 500
DENVER, COLORADO 80202-2466

RECEIVED
JUN - 1 1995
BUREAU OF LAND MANAGEMENT

MAY 26 1995

Ref: 8WM-EA

Bob Ross, Team Leader
Bureau of Land Management
Worland District
P.O. Box 119
Worland, Wyoming 82401-0019

Re: Grass Creek Resource Area, WY
Resource Management Plan / Draft
Environmental Impact Statement (DEIS)

Dear Mr. Ross,

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the DEIS for the **Grass Creek Resource Area Resource Management Plan** (RMP) and offers the following comments for your consideration in preparing the Final Environmental Impact Statement (FEIS). We are providing our comments from a perspective gained from recent reviews of other Bureau of Land Management (BLM) and Forest Service land management plans. Additionally, the issues addressed reflect EPA's comments submitted to the BLM during the scoping process for the EIS (Robert R. DeSpain to Joseph T. Vessels, 12/27/91).

ALTERNATIVES

The range of the four alternatives, analyzed in detail, appears inadequate for analyzing substantive differences in land use planning. In "Table 2, Comparison of Alternatives", it appears that the management objectives and actions for Alternatives A, B, and C typically state "Same as preferred." for each of the various land uses or resources. The Final EIS should highlight significant differences in the alternatives and indicate how the philosophy or objectives of Alternatives B and C contrasts from the Preferred Alternative and the Current Management A Alternative.

CUMULATIVE IMPACTS

The RMP does not address the cumulative impacts of the selected alternatives over the life of the RMP, nor does it address impacts from activities occurring on lands adjacent to the Grass Creek Resource Area. NEPA requires that cumulative effects be addressed as a summary of the individual effects of both the proposed action and any other "reasonably foreseeable" projects, including those generated by other entities and

Printed on Recycled Paper

575.2

2

occurring on other ownerships. The cumulative affects analysis should summarize the site specific impacts of past, current and proposed projects and occurrences upon physical ecological resources, such as water quality, air quality, vegetation, and wildlife.

ECOSYSTEMS AND ECOSYSTEM MANAGEMENT

The discussion on page 8 defines ecosystem management in general terms and indicates that ecosystem management will be incorporated into implementation of the RMP, site-specific plans, and daily management decisions. Since applying this concept to the land management process is relatively recent, it would be beneficial for the BLM to describe more specifically throughout the EIS how the ecosystem approach will be applied toward balancing various BLM land uses, such as oil and gas development, grazing, and forestland management, which cross jurisdictional boundaries (i.e. Shoshone National Forest, Wind River Reservation, and private lands). As an example, the Forestland Management preferred alternative states that "The management of forest and woodland resources would be consistent with ecosystem management principles." (DEIS, p.24) How will an ecosystem management approach for land management activities differ, on the ground, from the existing 1983 Grass Creek Management Framework Plan?

WATER QUALITY

Tables 9 and 10 in the DEIS (pages 128-129) indicate the planning areas watersheds and stream uses and classifications. Otherwise, as stated in the EIS, the determination of existing water quality conditions for the planning area appears to be fairly limited.

Section 319 of the Clean Water Act (CWA) requires States to identify nonpoint source threatened or water quality impaired streams and the sources and categories of pollutants affecting water quality; best management practices (BMPs); and to provide for a process of reviewing Federal activities to assure consistency of application and effectiveness of BMPS necessary to maintain or achieve water quality standards.

To supplement water quality information provided in the DEIS, we recommend that the BLM reference the Wyoming Department of Environmental Quality 303(d) list and 305(b) report. The RMP should summarize information from the references including water quality impaired or threatened stream segments, the pollutants of concern, the pollutant sources, and achievement of designated water uses. Such information is considered to be a key planning tool for assuring compliance with the Clean Water Act during site-specific project implementation.

575.3

3

MONITORING AND EVALUATION

The RMP contains minimal information regarding monitoring and evaluation requirements. The Final EIS should be modified to address monitoring and evaluation of resources in terms of the BLM's Resource Management Planning regulations stated below.

43 CFR § 1610.4-9 Monitoring and evaluation.

The proposed plan shall establish intervals and standards, as appropriate, for monitoring and evaluation of the plan. Such intervals and standards shall be based on the sensitivity of the resource to the decisions involved and shall provide for evaluation to determine whether mitigation measures are satisfactory, whether there has been significant change in the related plans of other Federal agencies, State or local governments, or Indian tribes, or whether there is new data of significance to the plan. The District Manager shall be responsible for monitoring and evaluating the plan in accordance with the established intervals and standards and at other times as appropriate to determine whether there is sufficient cause to warrant amendment or revision of the plan.

BEST MANAGEMENT PRACTICES

The Final EIS should provide a discussion of best management practices (BMPs) designed to reduce or prevent environmental impacts on resources. The discussion should describe how BMPs will be used to design agency initiated projects and to develop conditions for proponent initiated projects. The discussion should also address how projects will be monitored to determine the accuracy of BMP implementation and the effectiveness of the practices. BMPs must meet the minimum requirements of the Wyoming CWA 319(b) nonpoint source management plan.

The recognition of BMPs is of particular concern given that water quality impacts in the planning area have resulted from erosion and sedimentation. The DEIS notes that past watershed treatment treatments are no longer effective in addressing erosion and sedimentation concerns (page 131). What activities are planned to address this situation?

RIPARIAN FUNCTION

The discussion on riparian function (page 197) notes relatively modest improvements in functioning condition can be expected during the life of the plan. What basis was used in determining proper functioning condition (PFC) and how recently was the analysis completed? What limiting factors restrict

obtaining greater improvements in PFC? EPA encourages a stronger emphasis be applied particularly to the downward trend acres to avoid further losses to a nonfunctioning condition. We also recommend that the BLM incorporate concepts currently being developed for the purpose of Rangeland Reform implementation and consider whether further improvements to rangeland health may be achieved as a result.

Using a spring development BMP similar to NRCS Practice 574, EPA encourages the BLM to promote protection of springs in grazing practices.

Based on the procedures EPA uses to evaluate the potential effects of proposed actions and the adequacy of the information in the DEIS, the Draft EIS for the Grass Creek Resource Area Resource Management Plan will be listed in the Federal Register in the category EC-2 (environmental concerns, insufficient information). This category indicates that EPA has identified areas of potential environmental impacts that should be avoided in order to fully protect the environment. Also, the EIS does not contain sufficient information to fully assess environmental impacts that should be avoided in order to fully protect the environment.

We appreciate the opportunity to review and comment on the Draft EIS. If you may have any questions, please contact Larry Kimmel at (303) 293-1697.

Sincerely,

For J. William Gnies, Jr., Acting Chief
Environmental Assessment Branch
Water Management Division

U.S. DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

WORLAND DISTRICT OFFICE

GRASS CREEK RESOURCE AREA

TRANSCRIPT OF PROCEEDINGS

IN RE: GRASS CREEK RESOURCE AREA
RESOURCE MANAGEMENT PLAN
DRAFT ENVIRONMENTAL IMPACT STATEMENT

PUBLIC HEARING

ORIGINAL

ELKS LODGE
604 Coburn Avenue
Worland, Wyoming 82401
April 3, 1995

GONZALEZ REPORTING
Renee L. Gonzalez, RPR
420 S. 8th Street
Worland, Wyoming 82401
(307)-347-2714

INDEX

OPENING REMARKS BY MR. DANIELS	5
PRESENTATION BY BAILLIE MILLER	10
PRESENTATION BY JIM MAGAGNA	11
PRESENTATION BY SYLVIA GAMMS	17
PRESENTATION BY RAY PETERSON	24
PRESENTATION BY MIKE BAKER	28
PRESENTATION BY BILL GLANZ	31
PRESENTATION BY JAY MOODY	35
PRESENTATION BY SERYL CHURCHILL	39
BREAK	42
PRESENTATION BY CHARLES JOHNSTONE	42
PRESENTATION BY DARVIN LONGWELL	45
PRESENTATION BY JIM GOULD	46
PRESENTATION BY JAMES KIRSCH	51
PRESENTATION BY FRANK KELLY	53
PRESENTATION BY JIM FOREMAN	57
PRESENTATION BY KEN COOK	60
PRESENTATION BY MIKE TAUERNHEIM	62
PRESENTATION BY JOE ICENOGLE	66
PRESENTATION BY BRYCE BEECE	71
BREAK	77
PRESENTATION BY PAT CHILDERS	77
PRESENTATION BY BILL GARRARD	80
PRESENTATION BY PAT MOORE	84

INDEX CONTINUED

PRESENTATION BY JOHN CAMS	89
PRESENTATION BY CAVTO BAYERT	92
PRESENTATION BY KAREN ANDERS	95
PRESENTATION BY ANDY FRANKLIN	98
PRESENTATION BY WILLIAM CRAFT	99
PRESENTATION BY JIM HILLSBERRY	102
PRESENTATION BY TIM MORRISON	103
BREAK	110
PRESENTATION BY BILL TALIAFERRO	110
PRESENTATION BY GALLAS VALDEZ	113
PRESENTATION BY LYLE SPENCE	117
PRESENTATION BY DOROTHY MILEK	122
PRESENTATION BY ALLAN HOWARD	126
PRESENTATION BY KATHLEEN JACHOWSKI	129
PRESENTATION BY DENNIS JONES	131
PRESENTATION BY MARTIN DOBSON	134
PRESENTATION BY MONTE DOBSON	138
PRESENTATION BY GARY ANDERS	141
PRESENTATION BY LOIS MERKST	143
PRESENTATION BY JOHN FREIS	146
PRESENTATION BY GORDON FREIS	148
PRESENTATION BY DICK LOPER	151
PRESENTATION BY KEITH HAMILTON	158
PRESENTATION BY PAUL GALOVICH	161

INDEX CONTINUED

PRESENTATION BY CLARA VETTER	163
PRESENTATION BY DON GILBREATH	164
PRESENTATION BY MATT BROWN	169
PRESENTATION BY JAY MATHEWS	173

MONDAY, APRIL 3, 1995, 4:00 P.M.

MR. DANIELS: I have 4:00, so we'll bring this public hearing to order. Good afternoon and welcome to this public hearing that has been convened by the Department of the Interior, Bureau of Land Management, Worland District.

The purpose of this hearing is to receive comments concerning the Draft Environmental Impact Statement and its Preferred Alternative for managing the BLM administered lands and resources within the Grass Creek planning area.

My name is Bill Daniels. I'm from the BLM Wyoming State Office, Division of Resources, Policy, and Management. I've been asked to be the presiding officer at this hearing. I do not participate in this process except in the limited role as presiding officer. I make no recommendations in connection with this proceeding and have no further involvement in the outcome.

In addition, the following representatives of the Worland District BLM: Joe Venesle, on my left of the Grass Creek Area Resource Manager, and Bob Rose to his left, the Resource Management Plan Team Leader are here to receive your comments.

The purpose of the Draft Environmental Impact Statement was to document and compare the analysis of four

alternative land-use plans, including BLM's Preferred Alternative, and to provide an opportunity for public involvement in the planning process.

With the refinement of the Draft EIS and continued public involvement, the BLM hopes to develop a resource management plan that will guide management of the Grass Creek area for the next 15 to 20 years. The resource management plan would provide needed changes in BLM's current management direction for the planning area. An update decision for the management of resources, both mineral and surface administered by the Bureau of Land Management.

The current BLM land use plan is the 1983 Grass Creek Management Framework Plan. We call it an MFP. Policy and management changes have occurred since then including need to comply with the National Environmental Policy Act requiring an updated, comprehensive, and environmentally adequate management guide.

The Grass Creek resource area published a notice in the register on October the 19, 1991, indicating the intention of the BLM to prepare a resource management plan. A notice of filing also appeared in the federal register on January the 7, 1995, announcing the availability of the Draft EIS and beginning the 90 day comment period. The comment period has been extended to May the 7, 1995.

All comments received at this hearing will provided the Worland District with additional information for review and developing the final Environmental Impact Statement. The comments received today will be formally responded to in that final EIS document. This hearing is not an adversarial proceeding, and commentors presenting their views will not be placed under oath.

The purpose of the hearing is to gather information and not to exchange views. Your testimony should be relevant to the Draft Environmental Impact Statement. The agency representatives may ask clarifying questions or seek additional information at the conclusion of the speaker's comments. Any questions that may be asked should not be construed as indicating any pre-determined position of the official or of the Bureau of Land Management, but are simply to get further information for the record.

It should be mentioned here that all communication to the BLM on this topic is a matter of record, whether in the form of letters, faxes, phone calls, visits, or comments during scoping, open houses, and assorted meetings. Any communication made to the BLM as specific comments on this Draft Environmental Impact Statement will be a part of the public record.

A copy of this record is available for review at

the Worland district office. Because of the number of comments anticipated, the Worland district requests that if possible commentors specifically identify the section and page on which the comment is provided concerning the EIS, that is. This does not mean that your general comments are not desired, they certainly are. But where possible please identify the area of the document you are referencing. In addition commentors are asked to provide suggested wording changes wherever possible.

In order to ensure a complete and accurate record of the hearing it is necessary that only one person speak at a time. Also it is requested that everyone remain as quiet as possible when the hearing is in progress.

An official reporter is here today to record this hearing and provide a verbatim transcript. She's sitting -- seated at my right, Ms. Renee Gonzalez. If commentors have an extra copy of their prepared remarks, it would be helpful to the reporter that that copy were given to her before or after your presentation. This is for the reporter's assistance. And your remarks will be recorded whether or not you follow a prepared text.

In order to give all who desire to speak the opportunity to do so, each speaker will be permitted a maximum of five minutes for their presentation. I will let you know when you have one minute remaining so that you may

sum up your comments in an orderly manner. Usually you will see me get up and come to the podium when you have a minute left to speak.

Speakers will be called in the order in which their names appear on the list furnished to me for this purpose. In the event that a speaker is not present when his or her name is called we will proceed and that person's name will be called later after we have gotten through the list of speakers that we have. Please forgive my pronunciation of speakers' names for I have not necessarily seen them previously and have not had the good fortune to know each speaker personally.

Each speaker should begin his or her remarks by providing his or her name, occupation, and if desired your organization or group represented. Written statements are encouraged. If any speaker wishes to submit additional written testimony, please provide that material to the reporter and it will be marked as an exhibit and made part of the record of this hearing. The Worland district also will accept written comments from parties who prefer to provide written rather than oral submissions or from individuals unable to attend the public hearing.

Written submissions on the Draft Environmental Impact Statement should be postmarked by May 7, 1995. They should be addressed to the Bureau of Land Management,

Worland District Office, Bob Ross, RMP Team Leader, P.O. Box 119, Worland, Wyoming, 82401-0119.

All comments timely received will be analyzed and considered in the preparation of the final Environmental Impact Statement. Copies of the transcript of this hearing may be obtained by making the necessary arrangements with the court reporter.

My role in this hearing again is to ensure that the hearing is conducted in a fair manner, to maintain order, and to guarantee that everyone has the opportunity to present their comments on the Draft Environmental Impact Statement for the Grass Creek Resource Management Plan.

I would add, please refrain from smoking in this building during the formal hearing.

In case that you are interested, the anticipated completion of the final document should be sometime in the fall or perhaps as late as the first of the calendar year.

I will answer any questions on the hearing procedure now if there are any. So if there are any questions, feel free to ask them on the hearing procedure.

If there are none, we will start with the speakers them. We like to allow officials of the -- representatives of the state and the counties to come forth first, and then we go down through in the order in which people have signed up.

Our first speaker will be Baillie Miller, a representative of Congresswoman Barbara Cubin.

BAILLIE MILLER: I'm Baillie Miller. I'm the district representative for the Big Horn Basin for Representative Barbara Cubin. I'm out of our Casper office. I can't believe I have got to go first. Anyway this letter came from Barbara.

"I appreciate having this opportunity to comment on the BLM's Environmental Impact Statement and its Preferred Alternative for managing the public lands and resource in the Grass Creek planning area. Baillie Miller from our Casper office will be representing me on the comments made during this hearing. While I do not intend to micro-manage the Bureau of Land Management, I am concerned about the large number of comments I have already received on the issue.

Many fear that this signifies a new direction for the BLM away from the traditional balance of multiple users, in favor of wildlife and recreation. The proposed reduction in AUMs for livestock raising and various restrictions on surface uses which impact the oil and gas industry are cited as examples of the shift from our resource industries.

Likewise, the designation of areas of critical environmental concern are viewed by many as de facto wilderness areas made without the blessing of Congress.

I will be closely monitoring this issue. These proposed changes have the potential to cause serious harm to the four counties in this region. I did not come to Congress to watch the federal government slowly strangle Wyoming's economy by tightening its regulatory noose around the neck of our multiple users.

I thank the BLM employees who are all listening to our comments today and I would like to ask that they keep in mind the impact of their decisions on the people of Wyoming.

Finally, I ask that I continue to be kept informed on this issue as it winds its way through the process. Wyoming interests need to be heard every step of the way and a healthy balance must always be our goal. With warm regards, Barbara Cubin."

(Applause).

MR. DANIELS: Thank you very much. Our second speaker will represent Governor Geringer, Jim Magagna.

MR. MAGAGNA: Thank you. I'm Jim McGagna, Wyoming Director of State Lands, representing Governor Geringer today. I would like to preface my remarks by stating that we're not fully aware of what input into the process and development of this draft, might have come from the Governor's office under the previous administration, so please understand that we're -- our comments today are based

on the perspective of Governor Geringer, the current administration, and we view this as our initial input into this process.

I'd like to begin by addressing the grazing issue because I think it best exemplifies one of our major concerns, and that is with the choice of alternatives in the plan. Based on our experience with previous Environmental Impact Statements and the process of identifying alternatives, we view the (quote) "current management alternative," as one that should represent a commitment to the status quo in terms of what the agency has agreed to do. Using grazing as the example, current management to us would mean a commitment to manage the lands in order to provide the level of grazing that is currently authorized on the land.

What we find in reviewing this document it would appear is that all of the alternatives represent changes in the current authorized uses, it's just a matter of the degree of increments of change that separate one from the other. A good example, as I say, is grazing, where the proposed alternative reduces the authorized grazing by 35 percent, but the (quote) "current management," reduces it by 30 percent. We simply don't find this acceptable as addressing the current situation, the current commitment of the resources to meet the needs of the people of Wyoming.

These same numbers have a very significant impact economically for Wyoming agriculture as well because whether some of those AUMs are currently being grazed or not, they often form the economic basis for lenders to grant credit in the agricultural industry. And the impact of having reductions of 35 percent on the ability of agriculture to continue to finance itself are a major concern to us. And in fact looking at the socioeconomic impacts identified in the document, if we take the assumption of the document that the difference between the (quote) "current management," and the Preferred Alternative, 5 percent of the AUMs represents a 4 percent change in the economic impact to agriculture within the Grass Creek area, then I believe it's a safe assumption that the difference between current authorized use and the authorized use that will be permitted by the end of the implementation period of proposed action will actually represent a 20 percent decrease in what could be the economic viability of agriculture, of grazing in the Big Horn Basin.

Some of the specific methods used in grazing, again concern us. The use of utilization standards as nearly the sole basis upon which to base the majority. The high percentage of the reductions, and some of these standards being as low as possibly 25 percent in some areas. We would suggest to you that given the definition of

utilization in there that includes not only forage consumption by wildlife and livestock, but forage consumption simply through trampling and use be it by animal or human, the 25 percent or greater utilization in many cases could be reached without a single head of livestock being out upon the land.

We're equally concerned with the use of desired plant community without a role for the State in identifying what is desired in these plant communities for Wyoming. We realize that this is not a bad direction to go, desired plant community is certainly a realistic way of dealing with what we want out there. The problem is with who gets involved in deciding what it is that we want out there.

Let me move on quickly to some of the other areas that we also have concerns in. Mineral development. Under the proposed action, again compared only to the current management, a doubling of non-surface occupancy, and a doubling of controlled surface use, even more than that when it comes to seasonal use restrictions. We are supportive of those types of restrictions where they are based on a legitimate scientifically identified need to protect habitat and to protect certain wildlife species. We're concerned in this particular case that many of these were rather arbitrarily developed, and that the scientific development is not there to support them.

The off-road vehicle use, general broad prohibition identified on page 68 of the document, again we feel is excessive. There's a reference under recreation to (quote) "primitive recreation." We feel that the wide variety of recreation of the people of Wyoming as well as our many visitors engage in are from backpacking, horse back riding, off-road vehicle use, that's not primitive in our minds, that very much in the 20th and 21st Century. And it's something that we think needs to be treated with that level of dignity and allowed for in the opportunity provided for in the document.

Finally, let me comment just briefly as State Land Director on my particular concerns with regard to this type of a management perspective. There are many state lands intermingled with the BLM lands and these allotments. To the extent that the BLM so significantly reduces the authorized use on BLM lands de facto, you've reduced the authorized use on the state lands because they are not fenced lands. They are not separated lands. Under state policy the people who hold the surface leases for grazing on these lands pay for every AUM that's out there every year whether they can use it or not. We feel it's an injustice to these people when we at the State are being reimbursed for these AUMs and the policies of the federal government are denying them that use.

On the other side we have a concern for those state lands that are not directly intermingled with BLM lands, but are often contiguous to private lands and do lend themselves to be used independently. That as the thrust of reductions and reductions continue on federal lands, we're going to see a tendency to over-utilize those private and state lands to the detriment of a very important resource of the people of Wyoming.

And finally, another major concern that we have identified in the document is the commitment to the BLM together with the Nature Conservancy and the Fish and Wildlife Service identifying areas for the transplant of threatened and endangered species? We feel that this is totally inappropriate. It totally ignores the legitimate interests of the state. We're concerned about protecting those species. We don't want to introduce more problems by transplanting them into additional areas.

In closing, let me make two requests on behalf of the Governor and the State of Wyoming. First, before this process moves forward, an alternative is included that truly represents meeting the current legitimately and legally authorized uses for all multiple uses on these lands. Whether or not that alternative is the one that's finally adopted, it gives us a benchmark against which to measure the variety of other alternatives that are provided.

And finally, we would like to request that the opportunity be provided for a high level of state government involvement through the Governor's office and through a number of affected state agencies as you move forward with this process.

Again, thank you for your time today.

(Applause).

MR. DANIELS: Our next speaker will be our state representative, Sylvia Gams.

SYLVIA GAMMS: I am Sylvia Gams. I'm State Representative from House District 26, and I currently chair the Agriculture Public Lands and Water Resources Committee.

I appreciate the opportunity to address you today and to bring to light some of our concerns. And I would like to first of all thank everybody for coming and participating in this process today. We did send a request forward to have this opportunity, and I want everyone here to know I appreciate them showing up and lending their support.

My county is 83 percent federal lands, so you can understand why we're concerned about the economic impact upon our counties. My oral comments today may tend to be philosophical in nature but my written comments will include more factual information.

Most interestingly to me when we had our

pre-hearing briefing in Thermopolis, and the over-riding concern of all of those groups that attended there from the county commissioners, to the lessee, the oil and gas producers, sportsmen and casual users is the economics, and the lack of concern for local custom and culture. You can't raise taxes high enough to offset the revenue, local, county, and state are receiving from current permittees and from the oil and gas. You cannot suggest the reduction of 64,000 AUM's and claim not to impact the counties and their abilities to fund schools, hospitals, highways, and other services.

Agriculture and the livestock industry is particularly important to the economy of Wyoming. The livestock industry is the mainstay of our state agriculture industry. Eighty-two percent of all Wyoming agriculture resources are derived from the livestock and agriculture. And I have more facts and figures going along with that which I will submit.

Most residents of the impacted area are true believers in the multiple-use concept. Multiple use has been implemented and successful for over 100 years. This plan would close down multiple use. It cuts back on oil and gas, grazing, timbering, and recreational use. I didn't get too far into that DEIS before I disagreed. Page one, where it says all alternatives are multiple-use oriented. I would

suggest that in this plan we need a better definition of multiple use if we are to agree with this plan being truly multiple-use friendly.

We question the figures that were used in the analysis as being historical use numbers. Cattle prices and impacts were at a five-year low, and drought was being experienced during much of the data gathering. The reference section in the back of that book is something else. I suggest that references more reflective of the area could have been used by on-site agencies: Wyoming agencies, Soil Conservation Services, State Engineer's office, records available from the Wyoming Game and Fish Commission, plus reports from the University of Wyoming regarding impacts on federal lands. Your references relate earthquakes, biological climate changes, global climate changes, and water quality management dating from 1979. With all those references available to your department I suggest you could have come up with more current and efficient reporting methods.

The Wild Horse Management. A suggested change here would be simply to reduce the wild horse herd in this area. It's not necessary to have a wild horse herd this close to an authentic. And a real wild horse herd is located up in the Pryor Mountains less than 100 miles from here. The money spent on the Wild Horse and Burro Act, 16.5

million this year I might add, could be well spent in other areas. Many of these wild horses could be eliminated. We do not agree on the suggestion that the BLM purchase an additional 16,000 acres of private land to expand the wild horse habitat. At this point in time with the national budget, this money could be better saved.

And I also agree with Mr. Magnens where he quotes the part about the Nature Conservancy on page 53 where it says, "BLM would participate with The Nature Conservancy, U.S. Department of Interior Fish and Wildlife Service and other agencies in the evaluation of areas for the potential transplant of protected plant species on BLM-administered lands." To this suggestion I would like to just say no. We have enough problems in the area with weed control as it is and we don't need new ones being introduced. And quite frankly who is the lead organization in this proposal; Nature Conservancy? Sierra Club? Conservation Coalition? That is not an option that my groups will go along with.

The restrictions on no surface occupancy for oil and gas is a blatant shutdown of the multiple-use concept. And I will provide more documentation to that.

Nearly 67 percent of the total natural gas in Big Horn County comes from federal lands. We are very concerned about the potential impact from closing down oil, gas, coal and natural gas explorations.

One aspect we're not so proud of in Big Horn County is the fact that government is the largest employer in my county, followed by service, retail, wholesale trade, and then agriculture. Together these four sectors represent nearly 70 percent of the total employment in Big Horn County. Another aspect that the BLM may not want to own up to is the fact that their staff has nearly tripled since 1975. More than 90 percent of those BLM employees are here in the West. During that same time grazing leases have declined from 77,000 to 71, a 7 percent decline.

We have talked about the Fifteen Mile area of critical environmental concern. Nine-hundred square miles? Do we need another wilderness area? Fifteen Mile Creek has been identified because it causes sedimentation problems, but according to a report that I have, most of the sedimentation problem is caused during rainfall events. I would like to submit to you that an ACEC designation is not going to change the rainfall in the area. I would suggest that perhaps you could follow up on some of the other government reports available and could correct this part in your report.

In that same report it describes the rangeland as in fair to good condition. What means are necessary to measure rangeland condition and improve riparian areas when even the BLM's reports show the rangeland to be in good

condition. So I believe we can safely say we need more supporting data, current evaluations, and real input and consultation from the groups listed in these other reports.

Wildlife numbers are up. Wildlife numbers by your own count are up. Do we need federal -- the BLM helping us to manage wildlife in this area as has been suggested? Our answer to that is also no. From 1980 through 1989 BLM's own estimates showed tremendous increases of wildlife on public lands.

As I mentioned before when we had the pre-hearing meeting on the wolf it was very interesting to me that at the very time that the federal government is inflicting the reintroduction of the wolf on the State of Wyoming, they are stating it will not impact or effect private property rights in surrounding counties. I note on page 150 of your report that "evidence supporting the presence of the Northern Rocky Mountain Grey wolf in the planning area has been reported. Large wild canine sighting, tracks, scat, and howls indicate that the wolf may frequent the western quarter of the planning area." However this was neglected when we were doing the report in introduction into the park. "The wolf most likely would be present around concentrations of big game and away from people." There's so many contradictions in this report. We say that the wolf isn't there, then he is there. That we will not be increasing recreation and

than we will be increasing recreation. And I think that you need to go over and have your facts and figures just a little bit more clear.

So much for our trust in the federal government and their promise to contain the wolf and not infringe upon private property rights, when we already see in this statement your plan for expanding his boundaries.

A concern in the meeting that was brought up was the lack of predator control by the BLM. Here we are introducing more predators, or the potential to introduce more predators. And in your report there is not a predator control plan.

It's been stated in the report that tourism would pick up for the money that would be lost to our counties through the cutbacks in the grazing, oil and gas leasing, and timbering. You couldn't build hotels fast enough. And according to the reports that I have, and that are available to you from the University of Wyoming that was just paid for by our four-county coalition, during the summer months, our hotels in this area are at maximum now. There is not time, room, or space, or services available for enough tourists to make up the difference in economic impact.

We talked about access. And the hunters and sportsmen at the meeting in Thermopolis thought that access would be increased. And in my documentation I will present

how that is not exactly the case.

So in case you are wondering, are we opposed to this plan, I would suggest that it needs to go back, it needs to be written with current facts and figures, and with true consideration for local custom and culture. It is narrowly focused and with questionable methodologies. And I'm not a school teacher, but I think that if I was a school teacher and you handed me in that report I would probably hand it back and say couldn't you do a little better job?

(Applause).

MR. DANIELS: Thank you, very much. Our next speaker will be Ray Peterson, County Commissioner from Cowley.

RAY PETERSON: My name is Ray Peterson. I'm a County Commissioner for Big Horn County. I will be submitting a document and I will just kind of paraphrase from that document and quote a few things.

On page 33 we talk about Waste Management in the BLM proposal. We hope the 1,220 acres will help in future expansion needs. It talks about landfills and expansion needs of the communities of Thermopolis, Basin, Worland, and so on.

Last year BLM policy most Big Horn County over $100,000 having to purchase private ground for a landfill. There is no excuse for any federal agency not to assist with

local needs. We as a county don't have the choice of not having to deal with waste and EPA. It would be nice to have your assistance in these land matters next time. The wording in this document "would be considered." has us concerned to say the least.

Proposed AUM reductions total nearly 60,000 when you talk direct and indirect. This means nearly five million dollars in lost revenue and nearly 200 jobs. These are real figures that will directly affect the lifestyles of the people of our four-county area.

The promise of assumed, projected increase in tourism to replace this lost revenue does not convince Big Horn County residents. According to your figures, it would take a 71,320 increase of total visitor days just to replace those grazing dollars lost, and we haven't even talked about the loss of oil and mineral yet. This increase in tourism usage must be outside visitor use. Local use will not add any money to our local economies as the grazing and oil moneys do. To project a 32 percent increase in tourism is just a pie in the sky estimate made to offset the loss of real dollars of reduction of oil and grazing. Big Horn County history proves this point that tourism will never replace the ag economy that was lost in the Yellowtail area with the development of the Yellowtail Dam. Thirty years later the tourism hasn't happened and we are still

recovering from that loss of our economy.

Concerns of the economic study done for the BLM by the University of Wyoming. It mentions recreation. If we are to compare tourism dollars to replace oil, gas, minerals, and grazing dollars lost, then we must throw out all resident usage. These are not new incoming dollars. These dollars do not contribute to our valuation, schools or services as the oils and grazing dollars do. Your forecast for outside tourism increasing is overly exaggerated in this study.

Agriculture; 1990 was a poor base to use. We would suggest taking a medium, a composite of a number of years in a five or ten year period and use that as your base which would give you some real figures to go by. In order for this plan to be complete is has to address each county individually as to the effects that each of these reductions and added controls will have on each county. Big Horn County is requesting these figures.

Oil and Mineral; This area is very frightening to counties that realize nearly 80 percent or more of the county valuation based on this industry alone. Unless this plan addresses these concerns and reverses the current trend to decrease this industry on public lands, this plan will not stand or be accepted by Big Horn County.

And then to summarize and then I will present this

to the recorder. These are a few of the areas we as Big Horn County commissioners are concerned with. With federal agencies controlling over 80 percent of our county and the current trend to accomodate the environmentalists and tourists we are afraid that our way of life and very existence in this area is being threatened. When our input is considered on the same level as input from anyone else from anywhere else it concerns us as to how valid our input is and to what control we have over our own lands and lives. Tourists will never pay the bills in Wyoming. Our economy is diversified and must remain so. To put unreasonable controls on the very industries that contributes to our lifestyles and economy for the purpose of making the drive to Yellowstone more scenic for tourists driving through this is nonsense. Your agency controls nearly 70 percent of our county. You must help us preserve our land and our lifestyles without sacrificing the economy of the people you serve.

Until we see these suggested changes made to this plan and the report requested of how these proposed changes will effect Big Horn County alone, we stand against this document and suggest you file it right next to the Range Land Reform idea.

(Applause).

MR. DANIELS: Mike Baker, state

representative from Thermopolis.

MIKE BAKER: Thank you for the opportunity to comment today. One thing I should make clear before I start. I have no BLM permits. I have no consideration in the mineral development that might take place. I am simply a farmer and state representative on the side it you will. My real occupation is agriculture and private land, completely.

My comments today will focus on three particular areas and then the document as a whole.

First, let me say before I get too far that to me words mean things. And I think that they should mean things to all of us. We must use words as they are defined, or we risk losing all meaning that any document, any statement, or any communications that we have, and we will lose that meaning.

Specifically, I would like to comment on page 147 under the title Neotropical Migrant Birds. The draft EIS states that (quote), "The planning area provides nestings habitat for around 100 species for neotropical migrant birds. The population of most of those species are declining in part due to the habitat fragmentation on the breeding grounds in the planning area. Some example of these species are swallows, warblers, flycatchers and sparrows." What habitat fragmentation is occurring and what decline in bird numbers are documented? And why should

these statements be made if there is no documentation. It makes me wonder what possible neotropical migrant bird still next will be listed. And then what -- as an endangered species. And what requirement does that entail if in fact habitat fragmentation is occurring? Does that lead us to more federal control? Are we going to need to change fundamentally what occurs on the acres here?

Secondly, on pages 218 and 219 the list of those (quote) "consulted." It includes all elected officials in the Big Horn Basin. Consult in my dictionary means -- has words like counsel, advise, refer to, and consider. In fact having been contacted by one mailing in June of 1993, I do not consider that I, myself, have been consulted. And so I have a little problem and request that you remove any reference to me or my office from that consulted list.

Thirdly, on Table 3-5 on page 251 through 254 has in it a column listing (quote), "suitable AUMs." That clearly implies that some AUMs are not suitable. And if you look at that table, the table shows a reduction in authorized AUMs from 157,000 to a recommended 130,989. And suitable is listed at 108,000. If all the rest are not suitable, then how could any agency clearly say we're going to continue to do this. It seems to me that this document is setting up the BLM for what may be a friendly suit. By that very document you believe that suitable AUMs are being

exceeded. Well, maybe cattle free by '93 didn't work, so cattle reduced by '96 will.

My clear belief behind this document is to reduce the traditional uses of grazing, timbering, oil production, and mining, and increase the recreational opportunities, and Wyoming will grow by it, according to the document. But that defies financial sense. The average worker in the recreational field in Wyoming earns a wage of $12,300. The average worker in the other fields we have talked about Barns in excess of 300,000, in most situations. I didn't figure a complete average, but mineral production is well in excess of -- I said 300,000, I meant 30,000 per worker. How can Wyoming balance a budget on the backs of those people who are in fact earning below the poverty level. It will not work.

So let's admit our biases. Mine is toward multiple use in the culture that has made Wyoming what it is today. This document seems to be lock up the land, and shrink from consumptive uses of naturally occurring and regenerating resources. Let's throw out this plan and join together in coming to a new plan that truly consults with the public and builds a broadly based economy for Wyoming and for the Big Horn Basin. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Our next

speaker will be County Commissioner Bill Glanz from Worland.

MR. GLANZ: Good afternoon. I am coming here to read you a letter that we prepared as County Commissioners from Washakie County. The letter is addressed to Darrell Barnes and it's in reference to the Grass Creek Resource Management Plan.

The Washakie County Commissioners would like to thank the local Bureau of Land Management -- I have been thanking them all day today -- office for extending the comment period and allowing the public hearing on the draft EIS and proposed land-use plan as requested by the four counties. We appreciate that.

Our comments will be general in nature that we will have entered into the record today. More in depth concerns identifying specific sections of the plan will be submitted at a later date. I might add, the May 7th deadline for comments is only enough time to study one section of the plan at a time. The Bureau of Land Management has taken four years to prepare this document, and we received our first draft in January of '95. Four months is hardly enough time for us to address all the issues properly.

The law, through NEPA and FLMPA process requires federal agencies in the planning process to involve local and county governments at the planning table. We disagree

with the Bureau of Land Management that an invitation to an open house held by the Bureau of Land Management in the same as sitting together through a planning process, as required by law.

Our local economy and reduction of our tax base we feel is at risk and could cause extreme hardships on our local citizens that are left to pay the tax bill if this plan is implemented. That tax base can be identified under limiting oil and gas exploration and production. Timbering is also visible to our local economy. Plus limiting recreationists, limiting access by recreationists and hunters we feel will also affect our tax base.

A major problem the county has is the reduction of the AUMs by 25 percent. When there has already been an approximate 35 percent reduction in the last 20 years. Reducing the AUMs and doubling the wild horse herd range is to us, ridiculous, and certainly does not support any economic benefit to our county. Concerns we have cannot be researched by the May 7th deadline and could take as much as two years we feel.

To go on, the State of Wyoming, six years ago, in cooperation with the county governments developed a local Big Horn Basin Master Water Plan. That plan identifies 50,000 acre feet of water still to be used for irrigation purposes on newly developed land in the Big Horn Basin.

Fifty-thousand acre feet could be doubled under the Interior Department's new Conservation Plan. The Big Horn Basin Master Water Plan identifies approximately 60,000 acres, along with the water, of federally controlled land that can be put under irrigation. That plan went on to say that when the market can afford the development. The feasibility of that developing of such land is getting closer. The lands identified in the master plan are located from Thermopolis to Powell and are within the boundaries of the Grass Creek Resource Area. If we could put 50 percent of the identified land into production it would be a fifteen million dollar economic boost to the four counties here in the Big Horn Basin. And I am talking direct dollars, annually. The 30,000 acres proposed to be developed are a very small percentage compared to the nearly 4,000 acres this plan wants to set aside for critical environmental concerns.

Nowhere in the proposed Grass Creek Resource Plan is there reference to any of these lands to be developed for agriculture. These need to be identified and recognized in the plan, and if they are not it could be a great economic loss to this county's future.

To go on, the glossary we feel should be expanded to include definitions of all the terms used in the document. An index must be added to the document to

facilitate analysis. We feel that reference should cite specific publications and authors, especially for all decisions made in the document for which there is disagreement or controversy in the scientific and business community. Lack of a complete glossary and index and complete reference section has made it difficult, if not impossible to analyze the Grass Creek Resource Management Plan.

And in this management plan, perhaps in place of this management plan, perhaps a CRM plan would be more acceptable or coordinated resource management plan that could be developed.

In closing we as county commissioners are deeply concerned about our customs, cultures, and our economic base being eroded. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Our next speaker Jay Moody, and he is from Cody, Park County.

JAY MOODY: Thank you. As Bill said, I'm Jay Moody and I am speaking this afternoon on behalf of the Park County Board of Commissioners. And the comments that I will make this afternoon come from a letter that our board has written which is addressed to Mr. Bob Ross.

Proper management of our public lands and the unique quality of life it nurtures is important to the

citizens of Park County. We must think in terms of the next 50 to 100 years and manage these lands for our children and grandchildren. With this in mind the Board of Commissioners from Park County offer these comments which are based on input from our county task force assembled to evaluate the Draft RIS for the Grass Creek Resource Area.

1) Fire Management: The plan is calling for good fire management, but this is not followed through. There should be details included with acreage, location where burns are prescribed, fuel load, and a time table with an annual percentage target with a maximum of a 50-year burn cycle. It is better to manage through scheduled burns than to change the plan and cut allotments. The BLM should work with private landowners on burning agreements so that full suppression would not be necessary. We support fire management over chemical spraying.

Proper fire management would also have the added benefit of improving sage grouse habitat, and improved habitat would help keep the sage grouse off the endangered species list.

2) Fish Habitat: Enhancing potential fisheries in the area does not seem to improve the ecology of the area. New species should not be introduced into the area.

3) Forestland Management: The restrictions on harvesting firewood along Desert waterways and the Big Horn

and Greybull Rivers are not appropriate in all cases. A better management option in some cases would be to allow the removal of standing trees. Table 19 does not promote the regeneration and conversion of old-age forest. The mature and over mature stand is excessive and does not support the objectives set forth in the table. All four alternatives are inadequate for managing a stand that is 86 percent mature.

4) Grazing Management: There needs to be three viable alternatives. Much of this section is the same throughout, that is "same as preferred." There are no comments in the document that this area is in a serious deterioration mode. Hence there is no justification for cutting AUMs, except for where individual abuses can be identified. Every effort should be made to keep ranching viable. One possible alternative could be holistic resource management. The data used is based on 1990, which is not a typical year. Data should be averaged over all years available to establish a proper base line.

5) Off-road Vehicle Management: Signing and enforcement are not covered in the document. Areas for off-road vehicle use need a clearer designation. Fines should be established for driving in areas closed to ORV use. The proposed scenic interpretive road loop in the badlands area may increase off-road vehicle use.

6) Oil and Gas Management: In reviewing the historic aspects of the fields involves restricting their use. We do not support the review process. The no-surface occupancy and timing restrictions do not take new technologies into account. A more reasonable proposal for this area would be to allow corridors of access and to propose reasonable cluster development. Standard leasing terms and conditions sufficiently cover many of the concerns being used to justify the Preferred Alternative. The recoverable reserves projected are not based on fact. Estimates should have low and high ranges with the high range supported by data from similar fields in the area.

7) Special Management Areas: Creating an ACEC in the Fifteen Mile Creek watershed should not be done without adequate justification in the document.

8) Vegetation Management: The format used for plant communities is insufficient. Key species should be identified in each group and further broken down by species. A species list would be useful in the evaluation of areas for potential transplant of protected plant species.

9) Watershed Management: The benefits of water discharge from the oil fields needs to be recognized on a short-term basis for the productive lifetime of an oil field. In obtaining water rights, co-filing should be encouraged between the BLM and permittees. When fencing off

reservoirs, reliable sources of off-site water should be made available.

10) Wild Horses: We would like to see the money allocated to wild horse management used for range improvement; that is watershed, wildlife, and grazing, and concentrate the wild horse -- the wild horses in the McCullough Peaks area. The wild horse herd should be eliminated. At a minimum alternative B should be followed. The detrimental effects of having wild horses include that they compete with the wildlife and bring traffic into the area. This program is not cost effective and the money could be better spent elsewhere. Also the 2,300 AUMs could be additional allotted grazing opportunities.

11) Wildlife Habitat: Discussion on proposed increases in wildlife herds should occur with the Wyoming Game and Fish Department and permittees before any reductions in AUMs for livestock are implemented. Ground analysis of actual use by threatened and endangered species should occur before areas are withheld as crucial habitat. Thank you for your consideration of these matters. Respectfully, the Board of County Commissioners of Park County, Wyoming, John J. Winninger, Chairman; Charles N. Johnstone, Commissioner; Jill Shockley Siggins, Commissioner; Beryl Churchill, Commissioner, and Jay Moody, Commissioner.

I am submitting a written copy of these comments together with a detailed comment compilation from our advisory group.

(Applause).

MR. DANIELS: Beryl Churchill, Wyoming Rural Development Council.

BERYL CHURCHILL: My name is Beryl Churchill and I'm a Park County Commissioner. I appreciate the opportunity to comment on this very important management plan and ask you to enter this statement into the record.

First let me say that I support, without reservation, the letter commenting on the plan which was submitted to you by the Board of Park County Commissioners. These comments are based on the input of a county task force which was assembled to evaluate the Draft EIS for the Green Creek resource area. This task force devoted many hours to study the draft and are to be commended for their thorough review and intelligent conclusions. I would ask the task force comments be given serious consideration in the final EIS.

The task force's comments cover the major points I personally believe are unacceptable in the plan. However, there is one statement in the vegetation management section to which I strongly object and would like to comment on it. In this section while discussing the issue of candidate and

threatened and endangered plants, the suggestion is made that the (quote), "BLM participate with Nature Conservancy, U.S. Department of the Interior and Wildlife Service, and other agencies in the evaluation areas for the potential transplant of protected plant species on BLM administered lands" (unquote). The Nature Conservancy is a private organization. This statement suggests the conservation group somehow has the same status as federal agencies in determining the course of action on public lands. Not so. While it is logical to ask for the Nature Conservancy's input, it should not be the only private group which contributes to a management plan. The Farm Bureau, multiple-use associations, livestock organizations, and many other representatives of the diverse groups which use public lands for commercial or recreational purposes should be asked to participate in writing a plan. Participation by University of Wyoming specialists is also, I believe, critical.

For me, perhaps the biggest disappointment with the draft EIS was that the public was not notified before the first draft was written. The initial comments on the preliminary draft were largely ignored. At a meeting held in May, 1994, the public was told what would be in the plan without an opportunity for input.

Don't forget the customer base of this resource area. By enlisting the help and cooperation of natural

resource-based industry representatives in the four counties a plan could be written which would correctly address the needs of this customer base. I believe it would be reasonable to allow the counties to take the lead in preparing a preliminary plan which would then be submitted to the state director of BLM for reference before an environmental statement is written.

It has been nearly 13 years since a plan has been written. In the future, I urge you to prepare a management plan in a more timely manner and encourage local involvement at the very earliest stage of development.

Again, I appreciated the opportunity to express my views.

Also at this time, Mr. Chairman, I have a letter from Jack Winninger who had some problems today and is not able to be here. I would like to have it entered into the record. And it is his personal comment on the plan.

(Applause).

MR. DANIELS: Thank you very much. It's 5:00 and we'll take a ten minute recess and start again at about 12 minutes after.

(Whereupon a break was taken).

MR. DANIELS: If we can bring the hearing to order again. Our next speaker will be Charley Johnstone, Park County Commissioner.

CHARLES JOHNSTONE: My name is Charley Johnstone. I'm a Park County Commissioner, forester, a logger, and a lumberman. I'm also a member of the Sierra Club and the Yellowstone Coalition, not because I subscribe to their philosophies, but because I like to get their mail before I read it in the paper.

The people of Wyoming, the Big Horn Basin, and Park County derive the bulk of their livelihood and tax base from natural resources reaped from public lands within their respective political subdivisions. Since the federal government, at least for the moment, owns or controls most of the land within these subdivisions, they control the natural resource derived therefrom, and thus our economy and tax base.

This proposed Draft Environmental Impact Statement will have a serious negative impact on the economy of the families, cities, and counties in the Big Horn Basin. We in Park County are constantly being asked to provide more or higher levels of service from our citizenry.

Simultaneously, we're faced with ever-shrinking budgetary funds, largely because of the decline in revenues from public lands resources.

The residential subdivisions resulting from the influx of people to the county do not pay their own way. They have a net negative impact on the county budget. Even

you as government employees can be included in that group, in that you are among the direct beneficiaries of our public lands resource-based economy.

In this draft you propose to reduce everything that has a positive economic impact on our counties. Your blanket proposal to reduce grazing AUMs substantially is unacceptable. If you have isolated specific areas of concern individually, then handle them individually, not with this neat ax approach. Much of the AUM reduction is based on data from the old Grass Creek plan which the Bureau, itself, determined to be unreliable. The reduction of livestock AUMs in favor of the wild horse range expansion is a complete waste. Were you to do a cost benefit analysis of wild horses the result would almost entirely be on the cost side of the ledger. And I would be hard pressed to find tax revenue in the Park County Budget that could be traced to wild horses.

Clearly, the commercial timberlands in the Grass Creek area do not remotely compare in terms of productivity to the rain forest of the Pacific Northwest. But, they could be much more productive than they are -- than they are now if they were properly managed. The only way to induce productivity into a forest that is 85 percent mature or over-mature is to substantially thin it out.

The oil and gas industry in the Big Horn Basin is

clearly our principle benefactor. Anyone who does not understand that is either out of touch or they have been out of town. Rather than my going into great detail regarding this industry, I would defer to those much more qualified than I to address that issue, and simply submit six pages of comments prepared by the oil and gas industry to which I stipulate.

I am convinced that this Draft EIS is nothing more than another battle to be fought in Secretary Babbitts war on the West. It is remiss in addressing the customs, culture, and economy of the four counties in the Big Horn Basin, and thus is clearly, in my opinion in direct violation of the NEPA Act. I strongly recommend a complete rewrite with the active hands-on involvement of the four affected counties and their respective task forces. Thank you for the opportunity to speak. I submit these comments for the record.

(Applause).

MR. DANIELS: We would ask the speakers to please speak up and speak into the mike if possible. Some people in the back are having a difficult time hearing you. Our next speaker will be Hot Springs County Commissioner Darvin Longwell.

DARVIN LONGWELL: I'm Darvin Longwell, County Commissioner from Hot Springs County. This is a letter from

the Hot Springs County Commissioners to the BLM people.

The Hot Springs County Commissioners thank you for your attending the public meeting held in Thermopolis on March 21, 1995. Also we appreciated the opportunity for the hearing today.

We hope that all concerns of the people of Hot Springs County as presented by the committee persons will be taken under serious consideration by the BLM -- of land management. The plan you have set forth will have a serious negative economic impact for this area. If implemented as written we agree it spells financial disaster for Hot Springs County.

Various industries have spoken loud and plain on the issues and we believe these spokespersons have the support of all the people of Hot Springs County. The Hot Springs County Commissioners do strongly support the input from the people who have the expertise in oil, minerals, agriculture, recreation, and timber industries, and have spent time researching the Grass Creek Resource Area Environmental Impact Statement.

If the Grass Creek Resource Management Plan is implemented as drafted, the Hot Springs County Board of Commissioners cannot support this plan. Yours truly, Darvin Longwell, Hot Springs County Commissioners.

(Applause).

MR. DANIELS: Thank you very much. Our next speaker will be Jim Gould from Park County Conservation District Meeteetse.

JIM GOULD: I am Jim Gould. I'm chairman of the Meeteetse Conservation District. Today I am speaking on Meeteetse Conservation District's behalf. I would like to thank the Bureau of Land Management for holding this public hearing.

Meeteetse Conservation District, hereafter referred to as MCD has the responsibility to provide for the conservation of soil, and soil and water rights resources of this state, and thereby stabilizing ranching and farming operations, to preserve natural resources, protect the tax base, control floods, prevent impairment of dams and reservoirs, preserve wildlife, protect public lands, and protect and promote the health, safety and general welfare of the people of this state. This is by authority of Wyoming Statute Title 11, Chapter 16, 101 through 120, and United States Public law 566.

MCD is a local government and therefore enjoys all the provisions and protection of NEPA. NEPA 42 USC at Section 4332 (c) & (v) states that the comments of local government are to be included in the Grass Creek Area Draft Resource Management Environmental Impact Statement, hereafter referred to as the draft, through its entire

review process. The Bureau of Land Management is currently in violation of NEPA in this section for the RLM has not included the written and verbal comments provided by MCD during the scoping process. MCD is not listed in the required reviewers on pages 218 and 219 of the draft.

MCD in the initial stages of this scoping, requested the BLM to consider the Preferred Alternative of holistic resource management, hereafter referred to as HRM or Coordinate Resource Management.

The range utilization established by the federal government do not reflect climatic change as an often and overriding variable on grazing allotments. To reflect climatic change correctly in the range utilization levels, holistic resource management techniques must be applied to the resource health, and sustained grazing use. Cutting AUMs based on uncertain quantity of data as prescribed in the draft will not benefit the custom and culture and the economic base of the cooperators of the MCD.

MCD questions why the important benefits of livestock grazing on public land resources are not identified in the draft, such as that sustained livestock grazing can thicken, support, and sustain the multiple plant communities; that livestock hoof action works minerals into the upper soil horizons by the laying down of plants, to litter, combined with dumping and urination, completes the

mineral cycle; the elimination of sequencing (minerals and other nutrients being lost to the atmosphere or held in suspension); the increase of litter improves soil's resistance to wind and water erosion, and improves the moisture retention capability of the soil. MCD does not find the above mentioned qualities, benefits, or terminology such as water cycle, mineral cycle, energy flow and succession which are enhanced by cattle grazing, in the draft.

The BLM has followed the same standards year after year only to suffer the same pitfalls. The existing proposed standards cannot be the same for every grazing allotment. Therefore we need a new set of tools for true and effective management for the wide variety of resources for both the public and private benefit. The BLM must adopted the NRM guidelines and tools in order to effectively and economically manage and improve and sustain the Grass Creek area. These proven tools will take into consideration the entire resource base, the economic well-being, and the custom and culture of the individuals and communities within the Grass Creek area. MCD strongly recommends as evidence we entered into the scoping process that the BLM consider the goals, policies, NRM concepts of the Meeteetse Land Use and Resource Management Plan, 1994, and that it be used in reviewing and establishing revised management standards in

the final decision for the Grass Creek area.

The draft is not acceptable to the cooperators of the Meeteetse Conservation District in its present format. The draft must be rewritten to reflect the concerns and comments for the improvement received by the BLM officials from the past public forums sponsored by local communities and correspondence offered by affected communities in the Grass Creek Resource Area.

The comments recently made by BLM officials regarding paper AUMs versus real on-the-ground AUMs is disturbing, and Meeteetse Conservation District suggests that the history of adjudication of all existing AUMs on existing grazing allotments were well conceived and not done erratically or without regard to the resource. We suggest that the history of the adjudication of grazing allotments be researched and made part of the revised draft. For the BLM to maintain that a change is necessary in the existing number of AUMs on existing grazing allotments without conclusive evidence or a financial resolution thereof is a taking of private property rights subject to the provisions and jurisdiction of executive order number 12630.

MCD will provide the BLM with a video, the "New Rangeland Compact." We believe that the BLM needs to employ the concepts and ideas represented in the video. You have asked for positive input, please lead by example, employing

positive output.

MCD requests that the BLM use its new tools of GIS to identify problem areas and start working there.

I have more comments, but my time is up. I will submit them along with Meeteetse Conservation's Management Plan. Thank you.

(Applause).

MR. DANIELS: I would next like to call on Mr. Jim Kirsch, Thermopolis.

JIM KIRSCH: My name is Jim Kirsch. I'm the Manager of Hot Springs R.E.A., Incorporated. We're a rural electric utility that provides electric service in the rural regions of Hot Springs, Washakie, Park, and Big Horn Counties, excluding the towns of Thermopolis, Worland, and Kirby. We provide electric service in Hamilton Dome, Little Buffalo Basin, and smaller oil fields within the area.

I noticed in the Draft Environmental Resource Plan there are three goals; Vegetation Management, Special Management Area Designations, Resource Accessibility and Manageability.

I believe there are three areas that the plan is lacking. One, the plan does not take into consideration the economics of the residents of the resource area, the ability of the residents to increase their economic productivity, and does not support or encourage multiple use of the public

lands.

We notice that this document recommends fewer units of livestock and more restrictive mineral extraction practices. A multiple-plan which causes increased hardships on the people who live, work, and protect the area by their presence. It's not in the public interest.

I am particularly concerned about the section that deals with rights-of-way. I see that those areas where existing power lines are located and where people reside are areas that are asked for restriction of right-of-way. I notice that it is requested that we stay 500 feet away from riparian areas. I would suggest to you that it would be extremely difficult to provide electric facilities to places where people wish to reside and enhance the economic opportunities of the area if we are required to be that far away from riparian areas. Current restrictions already delay installation of facilities and are costly for both the utility and the member requesting service.

Any significant economic development will involve both transmission and distribution facilities. This document only addresses transmission facilities and is totally silent with regard to distribution facilities. I would hope that this document does not in any way make it more difficult for either the utility or the members to obtain rights-of-way.

On page 79, Table 16, a 1 percent change in 2.4 billion dollars is not thought to be significant. That 25 million dollars, even spread over 14 years is a significant change to the residents of Hot Springs and adjacent counties.

We believe this document should make it easier for people to promote economic activity in the Grass Creek area. Hot Springs R.E.A., its members and employees provide a stable population base which stimulates local and state-wide activity. Multiple use of public lands in Wyoming is a major factor in our members' quality of life and their ability to provide for their families.

Today's family members are the future Wyoming citizenry base. Thank you for the opportunity to provide these comments.

(Applause).

MR. DANIELS: Thank you very much. Mr. Frank Kelly, Greybull.

FRANK KELLY: My name is Frank Kelly. I am speaking for the membership of Grass Roots Alliance for State Sovereignty. Our concerns are for the assumptions that the Bureau of Land Management has the authority to impose regulations.

I refer now to the Declaration of Independence for parallels between the past and what is being attempted in

this room today. "We hold these truths to be self-evident, that all men are created equal, that they are endowed by their creator with certain unalienable rights, that among these are Life, Liberty, and the Pursuit of Happiness. That to secure these rights, Governments are instituted among men, deriving their just powers from the consent of the governed.

"And when a long train of abuses and usurpations, pursuing invariably the same objective evinces a design to reduce them under absolute despotism, it is their right, it is their duty, to throw off such government.

"The history of the federal government is a history of repeated injuries and usurpations, all having in direct object the establishment of an absolute Tyranny over these states. To prove this, let facts be submitted to a candid world.

"He has obstructed the Administration of Justice, by refusing his Assent to laws for establishing Judiciary Powers.

"He has made Judges dependent on his will alone, for the tenure of their offices, and the amount and payment of their salaries.

"He has erected a multitude of new offices, and sent hither swarms of Officers to harass our people, and eat out their substance."

Do you see a parallel between the past and what is being attempted in this room today?

"He has affected to render the federal agencies independent of and superior to the local power.

"He has combined with others to subject us to a jurisdiction foreign to our constitution, and unacknowledged by our laws; giving his assent to their acts of pretended legislation.

"For protecting them by a mock trial and phony regulations from punishment for any intrusion of private property rights and personal liberties upon the inhabitants of these states."

Do you see a parallel between the past and what is being attempted in this room today?

"For imposing Taxes and fees on us without our consent;

"For establishing therein an arbitrary government, and enlarging its boundaries so as to render it at once, an example and fit instrument for introducing the same absolute rule into those states;

"For taking away our charters, abolishing our most valuable laws, and altering fundamentally the forms of our Government;

"For declaring themselves invested with power to legislate for us in all cases whatsoever."

Do you see a parallel between the past and what is being attempted in this room today?

"In every stage of these oppressions we have petitioned for redress in the most humble terms. Our repeated petitions have been answered only by repeated injury. A government whose character is thus marked by every act which may define a tyrant, is unfit to be the ruler of a free people.

"Nor have we been wanting in attention to our federal brethren. We have warned them from time to time of attempts by their regulatory agencies to extend an unwarrantable jurisdiction over us. We have reminded them of the circumstances of the great state of Wyoming entering the union."

Do you see a parallel between the past and what is being attempted in this room today.

For further reference we refer you to the U.S. and the Wyoming Constitutions.

The opinion of Grass Roots Alliance for State Sovereignty is you have no semblance of authority to even bring forth such a document for our consideration, nor does the state have the authority to diminish the rights of the citizens, so says the Supreme Court in the case of Hurtado versus California. And Grass Roots intends to hold the federal government accountable to the supreme law of the

land, i.e., the U.S. and the Wyoming Constitutions.

I do have a copy of my speech, but you should already have it. It is called the Declaration of Independence. And our forefathers fought a revolution to end these sorts of abuses.

(Applause).

MR. DANIELS: Thank you very much. Mr. Jim Foreman, Tensleep.

JIM FOREMAN: Well, thank you. I have had the opportunity to study the 490 pages in the the two draft reports. The mission today is to condense 25 pages of notes into a few observations for presentation to you in five minutes.

The BLM reports represent a lot of hard work. And I would suggest that we don't shoot or blame the messengers here today. That will become evident at the end, I believe.

My belief is very simple, that permittees have paid for the leases, but we are still lessors of public lands. We have a responsibility to fix what we damage through livestock grazing. If it's broke, fix it. The key question is where is the significant damage now?

The problem is 16-year old ecological inventory shows that 35 percent of the 953,000 acres of BLM ground is in fair condition, with the balance in good or excellent condition, or not measured.

Vegetation monitoring data has been collected since 1983 using various techniques on 60 percent of the allotments, but with inspections only on the remaining 40 percent.

The current conclusion is that 63 or 53 percent of the allotments are in the improved category, of which 23 or 15 percent have had inspections only. Determinations are based primarily on subjective criteria which differs from the criteria used on the Washakie Resource Area.

Of the 2,260 acres of public riparian areas, 880 or 39 percent are in downward trend or are not functioning. That's not many acres.

The EIS document shows a major 35 percent decrease in allotment use under the Preferred Alternative. And as originally stated by Jim, a 30 percent decrease under current plans. The reported data indicates significant reductions have already been made during the past 15 years.

The impact, what does that mean? Current plans show the numbers, and I will just read a couple of them: 1.6 million dollars per year economic activity loss, a personal income loss of $354,000, and a loss of 27 jobs in the next ten years.

The preferred plan is somewhat higher. Economic losses are important, but the impact on people is devastating. Just look around at the Green Creek permittees

in this room. Over 20 percent, perhaps, or one in five could be out of work in ten years. How many ranches will be sold off. Will the Meeteetse High School close. This is why you have heard some and you will hear a lot more, I believe, of fear, frustration, and concern.

This impact is a high cost to pay for the defined 52,000 acre increase in upward vegetation trend, and a 38 percent or 330 acre reduction in the downward trend of the 880 acres on non-functioning riparian acres. The projected massive 45 percent increase in visitor days that yields seven to 14 new jobs does not compare with the loss in jobs existing today. There must be a better way.

There is a possible solution. There's absolutely no reason why Wyoming people, as represented in this room, and those many that are not here, environmentalists, cannot work together to objectively determine the problems due to livestock grazing. A combination of permittees, recreationalists, environmentalist, professionals, and BLM personnel working in the field should be able to agree both on the problems and a corrective action needed.

I am confident that the 880 acres of public riparian lands in the downward trend can be surveyed in one or two weeks. Why not try a pilot program on one allotment? Let's find out where the problem is. Wyoming has an excellent track record with CRM programs. At present

there's 80 that exist in the state. Let's build on the successes.

In conclusion, I would like to offer just three simple observations. The EIS current plan would reduce livestock grazing by 30 percent compared to the 35 percent in the preferred plan over 15 years. These reductions are similar to the 26 and 28 percent reductions in Rangeland '94 over the next ten years. It appears there's a strong effort to remove livestock from public lands. Could this and the recent Bureau of Reclamation plans indicated a conspiracy between the current administration and the extremists, national preservation organizations in Washington? Think about it. We don't have time to blame each other or the BLM messengers, this is unproductive. Let's work together to change the future. We certainly can't change the past. Thank you.

(Applause).

MR. DANIELS: Ken Cook, Mayor of Burlington.

KEN COOK: As the Mayor of the Town of Burlington I would like to present some figures to you that will probably illustrate in a very dramatic way why we as elected officials in the Town of Burlington are vitally concerned about the management of Wyoming's resources.

The town has a budget of approximately $55,000 per year. Now of this budget approximately 85 percent comes

from three sources; the mineral royalties, the severance taxes, and the sales and use tax.

Now, the amount, of course, of the sales and use tax is directly related to the health of the gas and oil industry, the mineral industry, and the livestock industry. Therefore, it is easy to see the serious impact that decreases in the productivity of these three industries would have not only for the Town of Burlington, but for every town in the State of Wyoming.

I would like to emphasize that in ten years the Town of Burlington, it's been incorporated for approximately ten years, has been fortunate enough to put in a town water and sewer system, develop parks for the children, improve our irrigation system through underground ditches, and build a new town hall.

Now the reason I mention these projects is because the vast majority of the money that was used to implement and complete these projects, as you've probably guessed, has come from the severance taxes, and the mineral royalties through the Farm Loan Board.

Therefore, as you can see the Town of Burlington, and speaking for every town, has much at stake in the future well-being of these industries. If these industries that I've mentioned falter due to over-regulation, it of course, would create a much higher -- necessitate the creation of

such higher taxes for the cities and counties in the state. And needless to say, the progress of the cities and counties in the state would slow to a snail's pace.

Because the federal government controls so much of the state, our tax base is, of course, very small.

Therefore, Burlington would oppose any new management proposals for the Grass Creek area that would hamper or impede the productivity of these three industries that I mentioned. Thank you very much for your time.

(Applause).

MR. DANIELS: Mike Dauernheim, Cody.

MIKE DAUERNHEIM: Good afternoon, my name is Mike Dauernheim and I work for Marathon Oil Company as the Manager of Oil and Gas Exploration in our Rocky Mountain Region office in Cody, Wyoming.

The primary objective of Marathon's efforts in the Rocky Mountain Region is to cost-effectively replace our oil and gas reserves through increased recovery of hydrocarbons from our existing fields., and from exploration for new reserves in yet-to-be-discovered fields. It is not an easy job. Many of you are probably aware of the precipitous decline in oil production in our state in the last ten years from over 120 million barrels in 1985 to the present day low of around 70 million barrels. This decline is particularly true in the Big Horn Basin with its predominance of mature

fields and relative lack of exploration for new reserves. Given the fact that many other operators have pulled out of the Big Horn Basin to focus on greener pastures in other states and countries, the state is set for a continuation of these declines. Marathon is still a major player in the Big Horn Basin and plans to be here for the long haul. That is why we are extremely interested in this DEIS.

From the technical side, we believe there is an abundance of hydrocarbons to be produced in this basin. However, we feel that the Preferred Alternative with its additional restrictions over and above those already in place will make it increasingly difficult to convince our upper management that work in this basin makes economic sense.

In our opinion, overly aggressive restrictions would hamper our ability to explore for and develop reserves. This, in turn, would do a severe disservice to the citizens of the Grass Creek Resource Area where during 1990 the oil and gas industry contributed over 250 million dollars of revenue to the local and state economies. We feel strongly that our operations can continue to exist in harmony with all other uses of the lands in this area without the need for these heavy restrictions. Our families live, work, and often retire here, and it goes without saying that it is definitely not our intention to harm the

state in any manner. We are proud of the jobs we do and are committed to continue conducting our business with a high regard for health, safety, and stewardship of the environment.

In our opinion, the DEIS does not accurately reflect the impact of the four alternatives on the oil and gas industry. In contrast to the DEIS' assumptions, there is no question that the various alternatives would lead to dramatically different exploration and development scenarios. More restrictions lead to less activity, and decreased activity leads to diminished production. Production declines lead to fewer jobs and less revenue at the local, state, and federal levels. The current management, under Alternative A, is sufficiently restrictive that many exploration and development projects are already discouraged.

The DEIS contains only limited socioeconomic data relating to oil and gas development, and it appears that this information was not a significant factor in the development of the BLM's Preferred Alternative. We feel that a comprehensive analysis of the socioeconomic benefits of oil and gas activities in the area must be a major component of the decision-making process. We recommend that the BLM show in the analysis a comparison of the cost of administering the minerals program and the industry's

financial contributions to local, state, and federal treasuries. The study must include a risk assessment and cost/benefit analysis to determine whether the benefits outweigh the risks of allowing less restricted oil and gas development in the area.

We oppose the Preferred Alternative contained in the DEIS because it would arbitrarily double the use of restrictive lease stipulations in the Grass Creek Resource Area. The BLM has failed to present any data in the DEIS which furnishes a basis for the significant increases in restrictions on future oil and gas exploration and development activities. The DEIS states it is BLM policy to show the need for constraints in planning documents and that it must also be demonstrated that less restrictive measures were considered but found insufficient to protect the resources identified. A general statement that there are sensitive or conflicting resource values or uses in the area certainly does not meet analysis or policy requirements. Clearly, it does not constitute justification for expanding lease or operational restrictions. Discussion of the specific resource to be safeguarded, along with a discussion of the perceived conflicts between it and oil and gas activities, must be given.

Marathon recommends the adoption of Alternative B which provides for minimum across-the-board restrictions.

Under this alternative, environmental, cultural, historical, and other concerns can be handled on a case-by-case basis under the provisions of Section 6 of the existing Federal Lease Agreement. This states in part, and I quote, "Lessee shall conduct operations in a manner that minimizes adverse impacts to the land, air, and water, to cultural, biological, visual and other resources, and to other land uses and users. Lessee shall take reasonable measures deemed necessary by Lessor to accomplish the intent of this section, to the extent consistent with lease rights granted such measures may include, but are not limited to modification to siting or design of facilities, timing of operations, and specification of interim and final reclamation measures." In our opinion, this would be a common sense approach to public land management which would enable the potential impacts of oil and gas operations on specific lands to be evaluated at the time work is proposed. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Our next speaker is Joe Icenogle, Cody.

JOE ICENOGLE: I'm Joe Icenogle. I'm a -- excuse me. I'm a Certified Professional Landman, but I am here speaking for myself. And I have gone through this draft EIS and this is the first time I've had an opportunity

to comment on one of these.

However, I've noticed on Chapter 1, page 8, "Ecosystems and Management. And I've noticed that the BLM has numerous definitions of ecosystem management, but in this DEIS you have it down as, "A process that considers the total environment, it requires that skillful use of ecological, economic, social, and managerial principles in managing ecosystems to produce, restore, or sustain ecosystem integrity and desired conditions, uses, products, values, and services over the long term." Well, my question is, is this an official BLM definition, or is this one that a staff person has generated, because I have participated in a buffalo resource area management plan and in that participation there was a report compiled by William Reiners and Robert Thueson out of the Department of Botany, from the University of Wyoming, in which they had three definitions of ecosystem management, none of which are incorporated into this report, they also state in that report that ecosystem management has been practiced for numerous years by de facto by the managers in the first place, that this is not a new concept.

In addition, I have here a copy of an ecosystem management definition which I have obtained from the Worland District BLM office a year ago, and it states that, "Ecosystem Management is the," interrogation -- excuse me.

"the integration of ecological, economic, and social principals, to manage a defined area or region called ecosystems, to maintain or improve natural diversity while sustaining the economic and social viability of people and communities." Well, I think the reason that we have so many definitions of ecosystem management is that after reviewing this DEIS, it appears that the BLM has little interest in sustaining the economic and social viability of people and communities. I mean it's sort of appalling when you read this, the increase in no-surface occupancy, the increase in controlled surface uses, it does not give industry; oil and gas, agriculture, timber any credibility for the new technologies that all these industries employ.

Number two, in developing alternatives under page 13, I notice that it states right there, why they didn't address eliminating livestock grazing? Why they didn't address eliminating timber harvesting or eliminating oil and gas leasing? How come they didn't address increasing livestock grazing, increasing timber harvesting, increasing oil and gas leasing? In today's ecological environment there's not one reason why the American people can't have healthy, multiple-use industries co-existing with a healthy environment.

On Table 2, page 16, you talk about Air Quality Management. The Preferred Alternative increases dust

control measures for all construction and other surface disturbing activities. Well, this is a broad and undefined definition. Does it apply equally to drill site construction, off-road vehicles, livestock herding, and wild horses? What will be the cost-benefit analysis of an unfunded mandate of this type?

I notice under Table 2, page 24, Forestland Management. The Preferred Alternative for the management objective, does not mention commercial forest products. Therefore, the management objective does not address the socioeconomic benefits derived from the commercial forest products. The BLM needs to incorporate people and their livelihoods into the Resource Management Plan as per the Worland BLM District's definition of Ecosystem Management.

Under Table 2, page 44, Gas and Oil. The Preferred Alternative increases the no-surface occupancy acreage to 20,200 acres, of which 2,130 acres has been identified as high potential. Is this in the best interest of the American people? I think not. Even with the technological advances in directional drilling the 17,100 no-surface occupancy acres is uneconomically feasible. Therefore, this acreage will not be leased. Therefore, the state and federal treasuries lose bonus income and potential royalty income, and rental income.

On Table 3, pages 79 through 82, Wildlife

Resources. Well, again I think the BLM is trying to lock out industry without scientific data. It appears that the majority of current stipulations will tighten up under the Preferred Alternative. My consideration and my concern is as mentioned previously, that the EIS look at very strong Alternative B, the standards stipulation under Section 6 of the oil and gas lease which was quoted before me. It protects archaeological studies, threatened endangered species, and I believe the multiple-use industry people should be added to the endangered species list, and how the lessee will conduct its operation in wildlife and vegetation resources, cultural resources, and watershed resources. These are all covered by the oil and gas lease. We need to take it on a case-by-case basis. A broad stroke of the wand is not beneficial.

In Air Quality, page 103, Chapter 3. In the last grammatical paragraph, second column, wherein natural geothermal activity is addressed, I believe this should be expanded to include hydrogen sulfide and sulfur dioxide. We mention how it is associated with gas and oil operations, but we do not talk about how much of that occurs naturally in our state parks, which it should be modified -- excuse me, it should be monitored and documented.

The last thing is Chapter 4, Environmental Consequences, page 291. In the discussion of Controlled

Surface Use, the Draft EIS states that, "maintenance and operation of the new fields could be curtailed for six to eight months of the year." Well, gentlemen, there's no oil field operator in their right mind that is going to shut in an oil field for six to eight months. This is uneconomically feasible. The technology is not there. Every time we shut in a field you have a potential to lose that production. This is -- excuse me, this is prohibited. We cannot allow this to happen.

I respectfully request that the RMP team re-write the Grass Creek Resource Area RMP and DEIS to incorporate scientific data, instead of assumptions, because the impact -- this document will have an impact on the livelihood of thousands of people and the economies of local, county, state, and federal governments. I appreciate my opportunity. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Mr. Bryce Reece, Casper.

BRYCE REECE: Thank you for allowing me this opportunity to present the comments of the Wyoming Wool Growers Association on the Draft Environmental Impact Statement on the Grass Creek Resource Area Resource Management Plan. My name is Bryce Reece, and I am the Executive Director of the Association.

The Wyoming Wool Growers Association represents over 1,200 active producers of lamb and wool in the state of Wyoming. Many of our producers live directly in the Grass Creek Resource Area and many more depend, in varying degrees, to this resource area for crucial livestock forage, so this draft EIS is of vital concern to us and our members.

I will be submitting complete, detailed comments on the entire Draft EIS this week, which currently totals over 25 pages, in which I will address our concerns in full. I am going to address today what I see are the more onerous and underlying themes which we believe entered into the drafting of this EIS, in the resulting form that it is today, which we, to say the least, find troubling.

Our organization has been actively involved in refuting and opposing the Clinton Administration's Rangeland Reform initiative for more than two years. Rangeland Reform is, in our estimation, the vehicle through which the radical environmental groups, in full cooperation and collaboration with the Clinton Administration, and many of those within the federal agencies themselves, intend to force the western livestock industries off of lands currently overseen by the federal land management agencies. This would then, in turn, destroy the entire livestock industry of the West. While Secretary Babbit, due to the political winds that blew last November 8 has delayed implementation of the Rangeland

Reform for at least six months. Upon reading the Draft Grass Creek RA EIS, it is readily apparent that indeed Rangeland Reform is here.

The underlying premise and theme of the BLM, in terms of livestock grazing that we find running throughout this document is that livestock grazing and wildlife are mutually exclusive. While this philosophy has been adopted and promoted for self-serving political and financial purposes by radical environmental and preservationist groups such as the National Wildlife Federation, Earth First, the Wyoming Wildlife Federation, and the Wyoming Outdoor Council, this is not the case and in fact is absolutely and totally false and absurd. Yet it appears that the BLM has joined in lock-step with these groups in adopting and promoting this philosophy, and documents such as this EIS are and will be the result of such misguided drivel.

And ideal case in point of the tactics used by these groups is the well-timed press release of the Wyoming Outdoor Council which appeared in an environmentally manipulated state-wide newspaper yesterday announcing and chastising this very plan. It is ludicrous and dangerous in our estimation for anyone to begin to believe that a radical environmental group such as this really finds fault with a plan that advocates, among other things, a reduction of livestock AUMs by a minimum of 35 percent and which more

than doubles the number of acres in this resource area which would have controlled surface use restrictions placed upon the oil and gas industry. I submit to you that these groups do not represent the majority of citizens, and in actuality represent a very minute segment of the general public. If the BLM is seriously concerned about the views of the public it would be well advised to listen, take to heart, and incorporate the suggestions and wishes of the four county commissions, and Governor Jim Geringer presented here today. These are the two representatives of the public which the Bureau should be concerned with.

We find very little sound scientific justification for many of the proposed actions under BLM's Preferred Alternative. One aspect of this plan which we find particularly disturbing and onerous is the theme throughout the entire Draft EIS which is not stated specifically anywhere in this document, but which should be, that BLM apparently believes there is a serious lack of numbers of certain species of wildlife in this resource area, specifically deer, antelope, and sage grouse. This then is used as justification for the drastic reductions proposed in the Preferred Alternative in resource industry use of these lands, lands which these industries are critically dependent upon. While we do not dispute and in fact agree with the fact that there may be a shortage of these and other

wildlife species in the Grass Creek RA, we adamantly dispute the fact that the fault for this lies with the use of these lands by industry, nor does the solution to this problem lie in the elimination or curtailment of industry use.

In fact, if this plan were to be put in place, as suggested in the BLM's Preferred Alternative, without addressing the real sources of these problems, very likely the past decline of wildlife numbers which has been seen, would continue. I would submit to you in fact that if the sheep industry in particular is forced off these lands as proposed in the Preferred Alternative, the decrease in several of these wildlife species would in fact accelerate. We maintain that the loss of most of the wildlife numbers in this area is not due to loss of habitat or modification of habitat. The loss of numbers can be attributed, in our estimation, to a number of factors which the BLM either inadvertently or purposely ignored.

Specifically, one of the most, if not the most significant reason for the loss of wildlife in this area as well in most other areas in this state, is in our estimation due directly to the horrendous affect which predators are having on these animals. We in the sheep industry know very well that Wyoming has become a slaughtering ground for not only our livestock but for much of the wildlife in the state. In 1984 the sheep industry lost an estimated 96,000

head of sheep and lambs to predators which is 18 percent of the producing sheep population of Wyoming. It's not hard to imagine if the sheep industry is suffering these types of losses on animals which in many cases have 24-hour per day protection, the level of loss which has to be inflicted on the state's wildlife resources is disastrous.

Another area of serious concern to us with the incomplete, inaccurate, and misleading analysis which the BLM has done on this proposed increase in economic activity and resulting increase on local economies due to the proposed changes in management, and focus of the BLM from resource development enhancement by industry to tourism. It's our contention, based upon several reputable and respected economic studies, that local economies which shifted tourism for their base, end up losing in the long run. Nowhere has the BLM attempted to quantify the cost to local and state economies from the relatively low paying jobs which are a result, often times, of increased tourism. The cost of providing basic services alone, such as schools, roads, governmental services such as increased law enforcement, entitlement programs, etc., are never recouped from low wage paying jobs which often accompany increased tourism. In fact, the net of such shifts are in fact costs to the state and local communities, rather than gains. Wyoming Governor Jim Geringer has alluded to this several

times in public addresses, and has clearly stated that the focus of his administration would not be on jobs for jobs sake, but rather on well-paying, long-term jobs which positively support and enhance both state and local economies, the types of jobs provided by natural resource industries.

MR. DANIELS: You're out of time, sir.

BRYCE REECE: Thank you.

MR. DANIELS: Thank you.

(Applause).

MR. DANIELS: Pat Childers from Cody. Could we interrupt you and take a short break? She needs to change her machine. About ten minutes, please.

(Whereupon a break was taken).

MR. DANIELS: Our next speaker will be Pat Childers from Cody.

PAT CHILDERS: My name is Pat Childers. I am a resident of Park County, Wyoming, the President of Park County Multiple Use Association, and the Government Affairs Coordinator for Marathon Oil Company's Rocky Mountain Region. As a representative of Park County Multiple Use, I would like to thank the BLM for the opportunity to comment on our major concern with the EIS.

On pages 122, 123, is the BLM's summary of the socioeconomics for the Grass Creek Resource Area in 1990.

This section does not reflect all the revenues generated, nor the direct as well as indirect economic impact. Since the oil and gas industry provides over 90 percent of the direct revenue within the Grass Creek Resource Area from federal lands, I would recommend including a more detailed study of that industry's economic impact.

On page 194, the BLM's prediction of the oil and gas industry's impact from 1990 to 2005 reflect their estimated economics for not only the Preferred Alternative, but also Alternatives A, B, and C. The BLM is assuming that none of the proposed alternatives will change the future hydrocarbon exploration in the resource area. The oil and gas industry, however, believe that the BLM's current management of the area will result in very little, if any, exploration in the future. The use of either the Preferred Alternative or Alternative C will result in no future exploration on federal lands. Alternative B, in turn, should result in incentives to lease and explore for hydrocarbons. For these reasons, I think the predictions of production and revenue impacts from our industry should be very different -- very different -- for each of the four alternatives rather than the case.

Since I volunteered to develop new predictions of oil and gas production for the four alternatives in the EIS, I have been working with personnel in my industry to develop

those numbers. At this time we have not completed our work; however, I have some preliminary comments. There are two oil and two gas prediction scenarios in Appendix 4 of the EIS that were developed by BLM personnel. In our opinion, those two scenarios indicate that the higher production numbers for both the oil and gas predictions could reflect the use of Alternative A or current management. Also, the lower numbers could reflect the use of the Preferred Alternative, or a projection of current production without any new exploration. While our analysis is ongoing, we feel our assumptions are within reason considering what is proposed for management of our industry in the EIS.

Working with the agriculture economists at the University of Wyoming who are under contract with the BLM, I suggested that the university develop two economic comparisons for me using the production predictions shown in the EIS with minor modifications. The results of their study of the oil and gas activities on federal lands are as follows: For what we call the current management alternative, the total economic activity impact from 1990 to 2005 would be 2.34 billion dollars. In 2005, government or tax revenues including royalties generated would be 23.4 million dollars as compared to 28.8 million dollars in 1990.

For what we call the Preferred Alternative, the total economic activity impact from 1990 to 2005 would be

1.78 billion dollars or a reduction of 21 percent from current management, or a total revenue loss of an average of 31.6 million dollars per year. In 2005, government revenues generated would be 14.3 million dollars as compared to the 23.4 million dollars from the 2005 current management values. From this simple comparison, we feel that the economic impact of the Preferred Alternative will be significant to the oil and gas industry and to the surrounding communities.

Those of us that are evaluating the production scenarios will continue to work on this data and with the BLM. I would hope that our efforts will result in a more reasonable approach to management of the Grass Creek Resource Area in the final EIS, and in turn, also result in a more favorable economy to the surrounding communities, and still minimize any environmental concerns. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Mr. Bill Gabbard, Worland.

BILL GABBARD: My name is Bill Gabbard and I own and operate a small oil field service company here in Worland and have done so for the last 24 years. We work throughout the Big Horn Basin and parts of the rest of Wyoming. I'm also President of the South Big Horn Basin Multiple Use Association. As president of the Multiple Use

Association I have concerns about nearly all of the Draft EIS, but with only five minutes I will address only the part that concerns my livelihood.

At a time when our domestic oil production is decreasing at an alarming rate, and our demand of import of foreign oil are increasing at an even higher rate, it seems odd to me that the BLM is proposing even more and more restrictions on the exploration, drilling, and production of oil and natural gas. The Draft EIS for the Grass Creek Resource Management Plan in regard to the oil and gas industry seems to put severe restrictions on exploration, drilling, and production of oil and gas.

Alternative B addresses minimal restrictions that could be handled on a case-by-case basis, using Section 6 of the Federal Lease Agreement. We recommend adopting Alternative B and we feel that environmental concerns can be minimized.

The controlled surface use, no-surface occupancy and timing limits add up to 40 percent of the total leasable acreage involved in this plan. There is no doubt that this would severely discourage any exploration or development. It would seem to me that the BLM should encourage exploration at this time and proceed with all the concerns addressed in the Draft EIS in mind. If a seismic survey is being planned, it could be planned at a time of the year so

as not to conflict with wildlife or damage the resource. The same would also apply to exploration drilling. It is obvious that if a well was drilled and was a dry hole or non-productive, that particular area would no longer be of any interest. Wells that have already been drilled in the area and have found to be non-commercial would seem to be eliminated from any further interest or impact. I think that the BLM as managers of the land owe it to the communities that they live in and to the American people to allow the industry to prove one way or another whether that a lease is productive or not. This would allow for the environmental concerns that we all share, whereas in a few short years down the road when we are faced with critical energy shortages and people don't have fuel for their cars and their toys, most of them won't give a damn about the environment or the Grass Creek Resource Area.

On page 195 there's a reference to produced water that implies that the water quality may be lowered. Correct me if I am wrong, but produced water has been discharged into Cottonwood Creek, Grass Creek, and other drainages for years, and has benefitted wildlife and livestock, and in some cases been used for irrigation. This section should be changed to show these benefits.

On page 42 it is stated that the visual resources would be considered before authorizing land use. Oil was

discovered and produced in Wyoming even before Wyoming became a state. And the oil and gas industry are a part of our culture and our heritage. And for that reason the visual restrictions should be dropped from this plan. The BLM in fact should promote this historical part of our heritage and our past, rather than putting on even more restrictions.

On page 150 under the heading of Threatened and Endangered Species, it is stated that there is evidence of the presence of the gray wolf. It is too bad that the BLM did not share this evidence with the Fish and Wildlife Service during the hearings on the reintroduction of the gray wolf as it would have been illegal to transplant these wolves when there was a native population already present.

To get away from the issues concerning the oil industry in my remaining time there's one issue that seems to have been overlooked totally in this plan, and that is the West River Project.

As you know, this project was a project that was to bring thousands of acres of land under irrigation west of the Big Horn River. There has been hundreds of thousands of dollars spent on the feasibility of this project. Due to the depressed economy in agriculture, this has been tabled and moved to the back burner for the present. Even though this project has been tabled for the time being, it should

be included in the EIS for the Grass Creek Resource Management Plan.

In closing, I want to thank the BLM for holding this public hearing and letting us have input into the process.

(Applause).

MR. DANIELS: Thank you very much. Pat Moore, from Jackson.

PAT MOORE: Good afternoon. Gentlemen, I'm hearing a lot of frustration here, and I wanted to enter into the record a document born of those frustrations, from the State of Wyoming, Joint House Resolution No. 0017, Conference of the States. A Bill for a joint resolution authorizing Wyoming to participate in the Conference of States.

Whereas, the United States Constitution established a balanced compound system of governance and through the Tenth Amendment, reserved all non-delegated, non-prohibited powers to the states or to the people; and

Whereas, over many years, the federal government has dramatically expanded the scope of its power and preempted state government authority and increasingly has treated states as administrative subdivisions or as special interest groups rather than coequal partners; and

Whereas, the federal government has granted

massive deficits and continues to mandate programs that state and local governments must administer; and

Whereas, the number of federal un funded mandates has grown exponentially during the last 30 years and has profoundly distorted state budgets thereby handcuffing the ability of the state leaders to provide appropriate and needed services to their constituencies; and

Whereas, since 1990 the federal government has enacted at least 42 major statutes imposing burdensome and expensive regulations and requirements on the states and local governments which is nearly equal to all of those enacted in the prior two decades combined; and

Whereas, persistent state-led endeavors have consistently failed to generate any substantial reaction remedied from the federal government; and

Whereas, the United States Supreme Court has repeatedly determined that the states must look to Congress and related political remedies for protection against federal encroachments on reserve powers of the states; and

Whereas, in recent years, state and local governments have been principle agents of government reform, and with local governments have been pioneers of government innovation, thus responding to the needs of their citizens; and

Whereas, the Council of State Governments has

recognized a sense of urgency in calling for the Conference of the States whereby each state would send a delegation to develop a comprehensive action plan to restore the balance in the federal system; and

Whereas, the Council of State Governments with its regional structure and groupings if elected and appointed officials from all three branches of state government reflects an entity ideally suited to promote and facilitate such a conference; and

Whereas, the Conference of States will communicate broad bipartisan public concern to the extent to which the American political system has been distorted and provide a formal forum for state governments to collectively propose constructive remedies for a more balanced state federal government's partnership for the 21st century.

Now, therefore be it resolved by the members of the Legislature of the State of Wyoming: Section 1, that a delegation of five voting persons from the State of Wyoming shall be appointed to represent the State of Wyoming at a Conference of the States for the purpose described in subsection (b) of this section to be convened as provided in subsection (c) of this section. The delegation shall consist of the governor or one of the other four state-wide elected officials designated by the governor, and four legislators, two from each house elected by the presiding

officer of that house. No more than two of the four legislators may be of the same political party. Each presiding officer may designate two alternate legislators, delegates, one from each party who have voting privileges in the absence of primary delegates.

(b) That the delegates of the Conference of States will propose, debate, and vote on elements of an action plan to restore checks and balances between the state and national governments. Measures agreed upon will be formalized in an instrument called the States' Petition and returned to the delegation's states for consideration by the entire legislature.

(c) That the Conference of the States shall be convened under the 501(c) auspices of the Council of State Governments in cooperation with the National Governors' Association and the National Conference of State Legislatures no later than 270 days after the legislatures of at least 26 states adopt this resolution without amendment.

(d) That prior to the official convening of the Conference of the States the steering committee created by the Council of State Governments will draft:

(i) The governance structure and procedural rules for the conference.

(ii) The process of receiving and

rebalancing proposals.

(iii) The financial and administrative functions of the conference, including the Council of State Governments as fiscal agent.

(e) That the bylaws of the conference shall:

(i) Conform to the provisions of this resolution;

(ii) Specify each delegation shall have one vote at the conference; and

(iii) Specify the conference agenda be limited to fundamental, structural and long-term reforms.

(f) Upon official convening of the Conference of States the state delegation will vote upon and approve the conference governing structure, operating rules and bylaws.

Section 2 --

MR. DANIELS: Your time is up.

PAT MOORE: All right. I would just like to conclude very quickly here that the last time we had a Conference of the States, gentlemen, was in 1786, and that was one year before we had a Constitutional Convention. And I think that you should deliver this message back to Bruce Babbit, that if he thinks breaking up this country is worth it, then he better be ready for the consequences. Thank you.

(Applause).

MR. DANIELS: Thank you. Mr. John Henry Gams, Conley.

JOHN GAMS: I'm John Henry Gams. I'm President of Big Horn County Multiple Use. In 1990 they come at us with the Yellowstone Coalition. We kind of bristled up. In '94 they come out with rangeland -- this book. We bristled up some more. In '95 this is it. Everything here contains Big Horn County and Northern Wyoming. And all those are EPA's and whatever. This is the Big Horn National Forest. This one here just come out, just got it in the mail. It's out of the Bureau of Reclamation. I like this book, it's honest. The heading is Proposed Acreage Limitation. It tells us what's going to happen.

Now, this white book. A lot of what I had to say has been said. But on page one, Alternate Multiple Use Orientated, I disagree with that. I think if you are orientated it's in a negative way. Grazing is declined by 7 percent, timber 27, and of course the oil industry, you've heard from them.

On page 27 there won't be any woodcutting along the Big Horn River because of the owl, that curtails a lot of country and a lot of people depend on woodcutting just for heat.

And then on page 130 and 201 it's been stated before that there is restrictions on endangered species,

mainly the wolf. And of course, they put the wolves in the park and made a welfare statement out of him. And then when they did turn him loose it took him what, three days to leave the park? Where does that put us?

I think that this statement is a continuation of the ecosystem, the Yellowstone Ecosystem. The park does not manage their livestock, which is their elk and their bison. The BANGS deal is very serious. I don't know if you guys know what brucellosis is in humans, it's undulant fever. The -- expecting us to manage not only the buffalo and their elk, but also their wolves.

Also in a statement on page 40 there's a discrepancy of water development. On page 80 there's no water development on 76,000 acres. Then on page 69, water development will be improved.

Also, I got a question on what variety of methods will be used in grazing strategies. Besides losing the 43,850 AUMs in the beginning, there's also restrictions on 120,000 acres for the elk, and the wolf probably, 47,000 acres for Big Horn Sheep, and the wolf, and 121,000 acres for antelope. He still might be hungry. This is a total of 288,000 acres. How many AUMs is that on top of this 43,000.

You're penalizing the ranchers in this area because the increase in the wildlife is an indication that, to me, that the range is in decent condition. And these

people have cut back on their AUMs to improve the land, and because they have done this you are going to take it away? Is that working with them?

And then we have been led to believe that we were told to decrease grazing to benefit wildlife and wild horses. And you've led us to believe that the Game and Fish are in favor of the wild horses. Well, these horses up there, it's a proven fact that they are feral horses, which is a domesticated horse gone wild.

The March 1995 issue of the Wyoming Game and Fish there's an article in there on the feral horses and what it is doing to the habitats. In this Alternate B, the effects on the land uses, I think the wild horses should be eliminated.

In another comment, most of the sedimentation of Big Horn River comes from the Fifteen Mile Creek, and that's more from the horses.

And on page 107 Native American Sacred and Spiritual Sites, there's nine kinds of sites. If you read this about the Big Horn Medicine Wheel, you better take a look at that a little further.

Just a year ago I stood at this microphone facing north looking at the majestic dominant bull elk. You guys didn't like him looking over your shoulder. This year you got me facing south under the Easter Bunny. What direction

is it going next year and under what season?

(Applause).

MR. DANIELS: Thank you very much. David Bayert, Basin.

DAVID BAYERT: I'm David Bayert. Pretty tough act to follow. My letter here is kind of brief. It's already been submitted for the record in written form. But I've jotted down a few more things as I've listened. And thank God I came. I've learned a lot. I would like to thank you for this hearing, the extension of the time. I understand that this hearing was not originally scheduled, this particular one. So for this extension, I do thank you. I've been gone out of the country for a while. I also work in the oil field and had to go up to Canada to make a living here the last couple of years.

So anyway, I'll just kind of read this letter. It's to Mr. Ross, but I guess actually it was written to all concerned.

Please acknowledge initially that I believe the local BLM personnel who, I assume, have worked diligently to prepare this Draft EIS, have done their jobs in accordance with official policy of the U.S. Department of the Interior. It is with this policy under current administration that I take issue.

First of all, I believe that federal

bureaucracies, such as the Department of the Interior, have no legal authority to restrict public land use and to develop land use policy on lands they don't own. The State of Wyoming and the counties in which the lands are situated should be responsible for planning, developing, and enforcing policy. It is my understanding that the state and county representatives have been basically, for all intents and purposes, excluded from the drafting of this EIS. Now, we, the people who live here, are thrown a bone called public comment to be considered along with the comments of preservationists who don't even live here. This you say is public involvement.

If the BLM is to be further entrusted with the management of Wyoming's public lands, I suggest that you really involve the Wyoming public. I'm tired of federal oppression that comes with hails of local control and local involvement.

In summary I suggest that the Grass Creek Resource Management Plan Draft Environmental Impact Statement be submitted to the State of Wyoming and the commissioners of Park, Big Horn, Washakie, and Hot Springs Counties for amendment and approval by the people.

The other suggestion I would make is to put BLM under authority of the individual states rather than the politically driven beltway mentality of the Department of

Interior, which has once again revealed our federal government's insatiable appetite for power and control over the lives of the American people. Sincerely, David Bayert.

And I also would like to ask a question. I would like to find out how much money the American taxpayers spent to put this mess together?

Another thing I would like to say is that being a responsible person as far as paying my debts, how can a nation who is over five trillion dollars in debt, justify the cost of what was the figure, fifteen million dollars a year for wild horse development? How can a nation in debt justify the cost of all the millions of dollars that it took to put this together? How can a nation in debt justify cutting federal revenues by decreasing oil and gas production? It doesn't make sense. People we have gotten plum irresponsible at the federal level. You are about to break the American people and we're tired of it.

(Applause).

MR. DANIELS: Mr. Gams?

JOHN GAMS: I forgot these, but there's some added letters.

MR. DANIELS: Okay.

JOHN GAMS: There's a couple of them that got the corners ripped off of them that people signed them then tore their signature off because they were scared of what

would happened. That's why they are like this.

MR. DANIELS: Our next speaker is Karen Anders, Greybull.

KAREN ANDERS: My name is Karen Anders and I have about four points that I wanted to make.

First, I believe that it never works to have rules made by those who are detached from the issue geographically or from the effect of those rules. This is particularly unfair when rules drafted for -- excuse me, when rules drafted are intended for others to live by without regard to the negative impacts the regulations will have on residents, businesses, and the economy. I've never done this before, sorry.

Second, Wyoming has an abundance of space. Some of this space is usable for a variety of purpose both for recreation and business. Should an area require restrictive uses, Wyoming should be imposing the restrictions necessary. Oh, I am shaking. Should an area require restrictive uses, Wyoming should be imposing the necessary restrictions. I am firm in my belief of what the U.S. Constitution and that of Wyoming clearly states, therefore -- now -- therefore, underscoring the rationale of my comments.

Third, I oppose this document and all subsequent documents. I strongly urge local citizen participation in the writing of any plans, contingent on the obvious impact

on the lands, residents, businesses, and economy. Wyoming should write the next plan for Wyoming.

Fourth, I do not believe that anyone who is living, or derives a living elsewhere should have one word of input as to the use of Wyoming's land. The very fact that Wyoming is so coveted is proof that Wyoming can handle Wyoming because we have.

Furthermore, I believe that all others have disqualified themselves having fowled their own nests. Thank you.

(Applause).

MR. DANIELS: Andy Franklin, Cody.

ANDY FRANKLIN: I hadn't noticed the Easter Bunny. My name is Andy Franklin. I live in Cody, Wyoming. 14-year tax paying resident of Wyoming. I am employed in the ecosystem enhancement and resource management business, in other words, the oil industry. I am strongly opposed to the Preferred Alternative outlined in the DEIS. I strongly oppose the indiscriminate doubling of acreage managed under no-surface occupancy and controlled surface use, and the reduction in acreage of leads covered by standard lease terms and conditions. I am in support of the language found in Alternative B of the Draft Environmental Impact Statement.

It is my understanding after reading the document

in the proposed alternative it is based on a perceived impact to wildlife, water quality, and soil condition that occupancy, especially oil and gas development and grazing would cause. I question the legitimacy of the DEIS' conclusions and can find no supporting data in the document to justify this support for the Preferred Alternative. In fact I would suggest that other more viable reasons for the perceived and not documented impacts on wildlife populations are neither mentioned or addressed. I am referring to predation, drought, and severity of winters. I strongly request that data, not conjecture, be furnished to support the conclusions of the Preferred Alternative. Further, I request that the data used to refute the alternative of less restrictions, Alternative 8, be shown to the public to demonstrate that these measures were insufficient to protect the resource area.

Although the document contains little data to support any of the conclusions used in developing the Preferred Alternative, of equal concern is the rapid development of socioeconomic impacts that will result in the Preferred Alternative. There is little tangible development of these impacts in the document, and what is presented can best be described as questionable and hastily prepared. In my opinion it is disappointing that a document of this nature would neglect to include the significance of federal

revenues generated by commodity users in this resource area. As much of this revenue ends up in state and local government treasuries, the DEIS does not accurately reflect the impacts of these entities the proposed alternative would have. I would remind the authors that revenue collection from mineral extraction is second only to the IRS in terms of federal revenue generation. Further, 56 percent of the federal royalty generated by oil and gas in federal lands, 100 percent of the lease fees and bonuses is a direct contribution to state and the local treasuries. Again, I have to question this data not being specified in the document and wonder if the BLM's own internal support for this Preferred Alternative would have been exited had it been accurately presented.

Finally, I request that the authors of the DEIS definitively answer to the public why the conditions of approval found if the standard lease terms, Section No. 6, are insufficient to adequately address and protect the amorphic concerns suggested in the DEIS. By example, can data be supplied that would suggest that the historic compliance with the standard lease terms has been insufficient to protect the resource?

In summary, I believe that the Preferred Alternative in the DEIS is a weak attempt to appease a vocal minority residing outside the State of Wyoming. I ask that

the authors of the document remove the Preferred Alternative from consideration and initiate research that would defend such an approach to those residents of this state that would be negatively and significantly impacted by its implications. The authors have not done their job if these socioeconomic impacts are not clearly and accurately identified and presented to these human residents of this ecosystem. The continued practice of this and similar avoidance in RMPs, will result in the employed human habitants of these ecosystems becoming the real endangered species. And I thank you.

(Applause).

MR. DANIELS: William Craft, Greybull.

WILLIAM CRAFT: I thought perhaps you had avoided me on purpose. I was interested to see John Osma carry up a stack of papers that high to tell us about what people have been doing for the last two or three years. I have a couple of books here. One of them is the Constitution of the State of Wyoming. The other, believe it or not is the Constitution of the United States, the Bill of Rights, and the Declaration of Independence, all in this one little document. And I can assure you that what is in these books exceeds by a hundred fold anything worth while that you have in that statement that you put together.

(Applause).

WILLIAM CRAFT: Naturally, I appear in opposition to the Grass Creek Draft Management Plan. I won't pick it apart piece by piece because it is so flawed that it really doesn't deserve that kind of a study. The opposition is not only because of the detrimental substance of the draft that would dramatically affect the economy of the area, but because of the restrictions on every use of the area which are not in the best interest of Wyoming and its citizens.

The very fact that we are being asked to accept management is something that the Federal government, and the Interior Department in particular, have no constitutional authority to be a part of, and to me it is disgusting.

I refer to you Article 21 Section 2 of the Wyoming Constitution. In that particular article it clearly states upon statehood or being admitted to the state that All land, all resources, personal, real, monies, credits, claims, and everything else was allocated to the State of Wyoming within the boundaries of the State of Wyoming became the jurisdiction of the Governor of the State of Wyoming, the Legislature of the State of Wyoming, and in particular the county commissioners of the State of Wyoming.

I just -- I can't understand how you people who live in this country, work for a government and I love God very much-- the idea that any of you really appreciate

either the constitution of the State of Wyoming or the federal constitution as well. And in a few days hence, we'll again be asked to accept arbitrary rules from the Bureau of Reclamation, another of Babbitt's agencies -- we know where this is coming from. I realize that it doesn't come from here -- on the matter of all of our water rights and that's through the Big Horn Drainage.

I refer you again to the Wyoming Constitution which clearly states that all water that arises, that originates within the State of Wyoming shall only be controlled by the State of Wyoming and its agencies. There's not a damn thing in there that says anything about the federal government having anything to do with our water. The fact of the matter we have precedent over water law because we have entered into -- the State of Wyoming has entered into compacts with various other states and allowed them the use of our overflow of water. And believe me, the very instance, the federal government had nothing to do with those agreements.

In this morning's paper we notice that in all probability cattle grazing will be biased for the threat to some kind of a toad. Again this comes from the Department of Interior. They never mentioned coyotes, they probably eat them as well.

The whole purpose of the Department of Interior is

to make it unprofitable to pursue any business venture, even on private property, and I refer you to the wetlands deal, thus creating this huge western park that due to the restrictions no one will be able to use because of their conflict with nature. This is nothing but the Yellowstone Ecosystem Plan being presented with a little different coat of paint. That's what it actually amounts to.

We no longer place first priority on our forest for lumber and homes. And if we do not put an end to this insanity that exists by these agencies there will not be enough trees left to even satisfy the paper requirements of the federal government.

(Applause).

MR. DANIELS: Thank you. Jim Hillberry, Powell.

JIM HILLBERRY: Thank you for affording us the opportunity of speaking again regarding your Grass Creek Draft EIS. I spoke with many of you before and many of these issues will probably start to seem redundant as we've expressed various ideas. However, today I am speaking on behalf of Spring Gulch Coal Company, a private operation in the Grass Creek Resource Area, Prospect Land and Cattle, a cattle operation in the Grass Creek East Resource Area with both BLM and private lands, Spring Gulch Cattle Company, Dee Hillberry, and myself Jim Hillberry.

The proposed plan is of great concern not only to those that I speak on behalf of, but to local communities, county governments, county and state agencies, livestock producers, and all other users of public lands. For the document would be the handbook, the guide, the Bible, if you will, of the Grass Creek Resource Area for the next ten plus years. Therefore, it is of utmost importance that information used as a basis for the decisions and the goals presented in the plan be complete, accurate, scientifically based, with all current alternatives considered.

Your open houses and many meetings with the groups throughout the resource area are to be commended, however it has become apparent that there is much information lacking that has been presented at these various open houses, specifically economics, custom and culture, and in some cases at these open houses conflicting information has been given by the department.

I'm especially concerned with your statements found on page eight, and I quote, "The principals of an economic management -- or excuse me, ecosystem management used in the BLM day-to-day management of the public lands and resources include recognition that people in their social and economic needs are an integral part of the ecological systems."

And on page 11, the challenge is to protect

resources, but still allow uses for activities that support the local economies such as oil and gas development, mining, ORV travel, livestock grazing, and timber. And yet it appears to me that many of your Preferred Alternatives in fact do just the opposite with such things as no-surface occupancy, reduction of AUMs, limited ORV travel.

Page 13 of the draft, again, in general, resource conditions on public lands in the planning area including range vegetation, watershed, and wildlife habitat, are not the result of livestock grazing alone and are not in a state of such poor condition or downward trend that they cannot be maintained or enhanced, or that would warrant elimination of livestock grazing on public lands.

Yet in your Table 17 on page 190, that's corrected, the Preferred Alternatives indicate a total 117,762 AUMs total authorized grazing, which is a reduction of 39,593 AUMs, or approximately 25 percent reduction of authorized AUMs from the 1990 base level. Yet resource conditions are not in a state of poor condition, downward trend, that they cannot be maintained or enhanced. Then why the reduction in the Preferred Alternative? The total authorized grazing should be left at the present level, the 157,000 plus AUMs. And I recommend eliminating all the other alternatives and use as a base the authorized AUMs for this resource area. Manage them with individual operators

to continue the economics, the custom and culture that this resource area has provided.

Also, on that same table the active preference presently is 101,451 AUMs, yet the Preferred Alternative shows 75,838. Again approximately 25 percent reduction of AUMs.

Economically, what does that amount to? On page 123 it tells us that in 1990 the livestock grazing on public lands administered by the BLM accounted for 5.8 million dollars, as well as 1.28 million of the area's personal income, and supported 101 jobs. Assuming that there be no reduction in livestock AUMs we will continue to provide that 5.8 million dollars, however with the 25 percent reduction that reduces to 4.35 million. Very important reduction into the resource area.

With the 25 percent reduction of our operators over there now with the limited numbers of livestock that they use, how many are going to be in the business by 2005?

MR. DANIELS: You are out of time, sir.

JIM HILLBERRY: Okay. I will provide my written comments to you. Thank you.

MR. DANIELS: Thank you very much. Tim Morrison, Meeteetse.

TIM MORRISON: Thank you for this opportunity to speak. My name is Tim Morrison and I am representing and

speaking for President Craig A. Griffith of the Meeteetse Multiple Use Association. Thank you for allowing our group to comment on the proposed land-use plan for the BLM administered land within the Grass Creek planning area. The ultimate goal of our organization is to attain wise management of resources without sacrificing the custom and culture of this area that evolved over the years.

The Draft EIS has focused on three key resource management issues: special management area designation, manageability and accessibility of resources, and vegetation management. All of these issues are as important as the other in developing the framework for managing and allocating the public land and resource uses. Our organization feels it is unacceptable to restrict oil and gas, grazing, timbering, mining and all other tax base providers. The Draft EIS for the Grass Creek Resource Management Area is not acceptable and should be rewritten to reflect the accomplishments of our past resource developers and stewards of these lands.

Any commodity access restriction will reduce our tax base and ultimately shift the tax burden to the property owners and small businesses of our communities. Park County has already seen a negative 15.3 percent decrease in assessed valuations of ag lands, residential, commercial, industrial and minerals between the years 1992 and 1994.

The reflection is very evident because the percent of increase on the residential only assessed valuation between the years 1992 and 1994 increase by 23.9 percent.

The BLM should be encouraging, not penalizing, small businesses and corporations by realizing the true socioeconomic impacts of the restrictions of the Grass Creek Resource Area Management Plan.

I'm also a surrogate person for Terri M. Sporkin who is also a resident of Meeteetse, Wyoming, who offers comments that are in written form. And they are very specific, but here's the statement.

After reading the Grass Creek Resource Area, Resource Management Plan Draft Environmental Impact Statement, I have found the BLM took the shortest way out in its development of the EIS, which also leaves out a possibly more effective alternative if they had done more thorough research, and had more up-to-date data and statistics than from 20 to 10 years ago. The BLM seems to have forgotten that NEPA requires current and reliable data and statistics for an EIS.

The BLM will say they had involved the community groups, ranchers, farmers, gas and oil, and people involved in recreation at the very beginning of the process. Probably, yes, these groups and individuals did submit opinions but the BLM probably did not think they fit into

what they wanted in the EIS. Unfortunately for the BLM, the EIS shows no much involvement, because the reading of all four alternatives definitely expressed the BLM's point of view and really shows no differences among each Alternative. If the BLM truly felt the People had a right to express their opinion in the plan, they would definitely find four entirely individual different alternatives, then what is in the draft plan now.

Ranching, farming, hunting, gas and oil, and recreation use has greatly changed in the last 65 years, even in the last 10 years and much of it is for the betterment of the land and wildlife. BLM personnel are not the only ones who have any form of education concerning land management. A majority of the farmers and ranchers today, to make it in the business, do have education beyond high school. They have taken courses or study-up on the material involving land management and environmental issues concerning maintaining the land, and have been applying this information in the every-day management of the land.

It was also noticed that the Yellowstone Ecosystem was mentioned in the Draft EIS but was not discussed in the Draft EIS. What are the Bureau of Land Management goals and objectives of the lands in the area of Yellowstone National Park? How much input on this subject was brought forth from the United States Park Service and the United States Forest

service, and what is the ultimate goals on this subject?

Last but not least, this whole Draft EIS is definitely written to ultimately all types of resource production, gas and oil, mineral, lumber, cattle and domestic sheep production from BLM public lands in the Grass Creek Resource Area. When this has been accomplished I would highly recommend to the people in any western BLM office to start looking for other jobs, because recreational or tourist activities and wildlife do not pay the fees, let alone the residential and business taxes that pay your salaries. Sincerely, Terri M. Sporkin.

(Applause).

TIM MORRISON: Lastly, I have some similar comments by myself. One of the questions I've raised in the past was concerning NEPA and the relationship of having good scientific data to back up the plan. That seems to be a question that's been addressed here today. I would hope in the future if there's an EIS (ins), that it's actually addressed in the final.

Specifically, on page 202, and I believe it's the third paragraph on the left-hand side of the first column, the statement in here is, "Planning area-wide grazing in riparian areas affects channel stability, riparian vegetation, and fish habitat more than any other land use. I don't see any discussion at all in this document why that

is. I mean there's no discussion whatsoever.

Thank you for your time, and I appreciate it.

(Applause).

MR. DANIELS: We'll take a ten-minute break and our next speaker will be Bill Taliaferro.

(Whereupon a break was taken).

BILL TALIAFERRO: I'm Bill Taliaferro, Rock Springs, Wyoming. I have no permits in the area, but I do think this is another boiler plate Draft EIS document typical of the BLM.

First of all, I see no reference in this EIS that deals with Wyoming's Strategic Plan for Agriculture. That took about four years with a great deal of effort on the part of state government, the Wyoming Department of Agriculture, and people throughout the state, and there is no reference and there is no -- this document does not enhance Wyoming's Strategic Plan for Agriculture which has a pretty fair section in the Big Horn Basin in enhancement of the livestock industry in this area.

Secondly, I don't see where this document is relevant to an act that was passed in 1966 called the National Historic and Preservation Act. And this act was not built to beat up people, and unfortunately I've seen the oil and gas industry, and the mining industry, and now the livestock industry come to this with interpretations by the

bureau and bureau personnel that's used just for that purpose. This is a pretty good act, which says in fact that you are going to enhance the cultural resources of this country and of the West. And any rancher in here that's over 50 years old, and that's what the bureau uses as historic, and I suppose most of these ranches and most of the oil producers in this area are over 50 years old, most of these communities are over 50 years old, I think it's your obligation which says in part 4 under Section 1, "The preservation of this irreplaceable heritage is in the public interest so as by the legacy of cultural, educational, aesthetic, inspirational, economic and energy benefits" I'll refute again, "economic and energy benefits will be maintained and enriched for future generations of Americans." Nowhere in this document have you -- is there any economic benefits, or maintenance, or enrichments.

I think what you are doing in Section 5 of the first part of Section 1 it says, "In the face of ever increasing extensions of urban centers, highways, residential, and industrial developments, the present governmental and governmental historic preservation programs and activities are inadequate to ensure future generations a genuine opportunity to appreciate and enjoy the rich heritage of this nation." This document, like documents throughout Wyoming by your agency, is forcing the ranchers

to sell and subdivide, and do exactly what you don't want done, or at least what Congress didn't want done.

I sit on the board of trustees of Western Wyoming College and I can tell you that with the tax basis going down, with everyone shutting in oil and gas well, with Mesco not doing any exploration in southwestern Wyoming, and with the proposals you have in this area and I assume Newcastle and some other BLM areas and forest areas have similar type structures on EISs, that with the 79 million dollar budget deficit next year for the State of Wyoming, and that was before all these oil companies started shutting in gas wells, that the community colleges throughout Wyoming are going to be in a dire financial strait. And if they do down into a dire financial strait because of rules and regulations, and most of them have been federally mandated, and most of them have been carried out by your agencies we will all know who to blame. And I and the board of college trustees most certainly are going to lay that at the foot of the BLM, Secretary of the Interior, and the President himself, because we're under dire financial stress.

And it's amazing that we have to take -- 34 percent of the students coming into our college have to have remedial math and remedial reading to start qualifying, and we're talking about shutting in oil and gas wells. And I can tell you that the colleges, the recreation centers, the

tennis courts, the sewer systems in Wyoming are not paid for by homeowners and ranchers, it's our vast mineral industry and natural resources that pays for that. And most certainly you keep this up, your children are going to be more encumbered than our children are.

(Applause).

MR. DANIELS: Thank you. Dallas Valdez from Laramie.

DALLAS VALDEZ: Hello, my name is Dallas Valdez, and I represent the Wyoming Resource Providers Coalition. I'm their state coordinator.

The BLM has proposed four alternatives, however these four alternatives do not provide the required range of potential alternatives provided by law under NEPA. The DEIS fails to adequately address socioeconomic impacts of the alternatives. Within the 300-page document there's very little discussion concerning impacts to the livelihood of the citizens of these counties. The socioeconomic presentation is superficial at best, even though the BLM has a 150 to 200-page document from the University of Wyoming addressing socioeconomics. The BLM socioeconomic breakdown of the area is very general in nature. For the socioeconomics to have value to the average citizen, it should be broken down into geographic areas, such as counties. This has not been done but could be produced

quite easily from most of the counties. Currently, the University has a model for Washakie and Big Horn Counties, and has a partial model for Park County.

By separating the socioeconomic impact into counties, each county's officials and citizens could understand the impacts to their area. With this information available, they could then respond accurately to areas of concern to supply information to the BLM that refutes or agrees with the analysis. The document does not currently analyze the fiscal impacts to the local communities introduced under the various alternatives. What will be the loss in monies for public services including the agencies under each alternative? This is an important part of the socioeconomics of an area's ability to survive.

The BLM's generalist approach and development of the socioeconomic impacts reflects the agency's lack of genuine concern and interest for the communities and counties involved. A concerted effort should have been made by the BLM to have a model for Hot Springs County developed. Wyoming's citizens would have been well-served if the BLM had presented itself formally before each county commission with the express purpose of profiling how important and necessary a county-specific economic model would be.

The BLM should have used such opportunities to offer to earmark some of its NEPA funds for these efforts.

The counties would have had to secure the remainder of needed funds elsewhere.

It is this caliber of developing partnerships, consensus building, and public awareness with which the Bureau of Land Management should exhibit as standard operating procedure. The Wyoming Resource Providers Coalition wants to see any final document reflect full and serious economic models for each involved county.

Within the DEIS, there is no explanation of how the BLM derived the numbers it supplied to the University economist. We all know that for models to be accurate we need accurate input that can be justified and explained. The BLM, like anybody else, must explain and justify the numbers they used to represent units of production under the socioeconomic study. Without this justification, these numbers are unacceptable. Currently, the BLM has not explained or justified the numbers it supplied. Where did they come from? Are they historic trends?

I was informed by the economist that had he gathered the data for the study, he would have contacted industry, local communities within the study area, the BLM, and other groups. He would have also contacted these individuals to get the numbers that accurately represented the value of a unit of production. These numbers would be used in the models to generate the economic impacts from

different levels of production. Once this was accomplished, he would present the numbers to the individuals affected to see if the study accurately represented current and future projections of expenditures in the area.

Currently, the BLM has not supplied adequate data to represent differences for mineral expenditures under the various alternatives. Under each alternative, different stipulations are implemented, such as timing, and no-surface or surface occupancy. But, the socioeconomic impacts of these different stipulations are not fully addressed. The BLM must address changes in the level or cost of production to more accurately address the stipulations within each alternative. If there is no-surface occupancy in an area, the potential expenditures for mineral exploration or development deteriorates because the cost becomes too high; this needs to be more fully addressed and accounted for according to University representatives.

Another concern is that the data used for recreation may over-inflate the actual contribution to the area. These numbers need to come from a primary survey of the area to actually interpret if use is by a community member or an outside individual. The only real value added to the economy is from people that come into the area. These numbers could be derived from the individuals in the area.

To ultimately improve the socioeconomics of the DEIS. It is recommended that the BLM work with everyone involved in the area. Rob Fletcher, University of Wyoming, said that he worked on a document in Sheridan that included representatives from industry and business in the area, as well as, environmental groups and the press. They felt that the socioeconomic document received little resistance because everyone was involved in its preparation. The BLM must take into account changes in expenditure and make adjustments in its numbers for production or cost within each alternative.

It is very disturbing that the communities have had very little input into the DEIS as they will be the most severely affected party over the next 15 years. Mr. Fletcher and his associate stated that it would be beneficial to all if the economic impact section was presented as a stand-alone document that could be pulled out and analyzed separately. Most importantly, the BLM should include the communities in the preparation of the document and allow them the opportunity to present alternatives for study. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Lyle Spence, Worland.

LYLE SPENCE: Well, I was told when I

registered that I was number 23 on the agenda so my recap is it's opponents 22 and proponents 0. And I hope I can hold the streak.

I would also want to say that Jackson, Rock Springs, and Laramie, are a long way from here. And I would like to have you assign one of your people the task of adding up all the miles that all the various witnesses drove to be here and express their feelings on this.

But I want to thank you for letting us speak. Thank you for hearing us. There was persons of the BLM that asked me when I walked in if I was here to offer my full support. And I do support having a management plan, that we need to have a management plan, but the problem I want to speak to is the appearance in this proposal must be predisposed against agriculture, and livestock in particular. And my point is that it shouldn't be predisposed against agriculture.

My name is Lyle Spence and I live in the city of Worland. I don't have an agricultural or mineral operation of any kind. Don't hold any grazing permits. I am an avid outdoorsman, and my wife and I spend virtually all of our recreational time out hunting or fishing, or otherwise doing something to do with the natural resources that are the subject of this hearing and this study. I am telling you I have a very keen consumptive interest in the wildlife

resources that are such an important part of this study and that's part of my qualifications for testifying here today.

I also speak from the informed source of my employment with Farm Credit Services, which is a lending institution that deals almost exclusively with farmers and ranchers. And I personally administer loans to farmers and ranchers throughout the northwest part of the state of Wyoming. My comments are my own, but they are founded in part on the information that I have through my employment.

The reason that I am here is that I think there's an Area of Critical Economic Concern, or an ACEC, that is negatively impacted by this proposal, and that ACEC is the whole Grass Creek Resource Area. There's a species in that whole area whose long-term survivability is not adequately considered in your proposal. It's the species that manages the land and pays the taxes that build the roads and schools, and supports the communities and industries that make this whole region habitable by all of us, and enjoyable to those who visit. That species is the agricultural producer.

Now during this last year's hearing on Rangeland Reform '94, I provided an example of a typical ranch family and their historical financial performance in order to provide more examples for your study. But nobody asked for any more. And I brought more with me today. I have in my

hand a summary of a study of earnings efficiency of 18 ranch operations in northwest Wyoming. Five of the 18 ranches summarized here graze livestock in the Grass Creek Resource Area. Now 18 ranches you say is not a lot, but those 18 ranches have 10,000 cows, and summarized here are 55 years of combined income statements on those ranches. And if you took those statements and stacked them end-to-end, they would reach 75 feet in the air, I think taller than any building in the city of Worland. If I did my math right this represents 37,000 cow years of financial performance data, all of it occurring in the 1990s.

In the summary it shows, on average, those ranches had an earnings efficiency ratio of 23 percent. What I mean by that is out of every dollar generated in revenue, they had 22 cents left after expenses were paid. With that 22 cents they fed their families, they paid their lenders or made their payments on land, they had to replace their capital as it wore out, and they had to improve their lands and grow their business, if possible. And that's all accurate historic data. But relate that to current economics.

I attended, participated here in a Beef Industry Symposium in this very room last Friday. There were a number of very well qualified speakers on the issues of the cattle industry. And I don't remember seeing anybody here

from the BLM. But the conclusions and the fact today is that the feeder cattle market is 22 percent lower than it was a year ago. The fat cattle market is 19 percent lower than it was a year ago. The cost of financing are 30 to 35 percent higher than they were a year ago. In respect to the outlook for the next three years, prices will remain at the same levels.

These people's historic margin of 22 cents is gone for the foreseeable future. And what that means, to go back, that's money that they feed their families with, pay back their lenders with, they replace their capital, improve their lands, and build their businesses. Well, that's not going to happen in the current economic environment. I'm not here to press the panic button this year, but we have to deal with the reality that this industry cannot bear any more burdens while these families try to adjust to the current and foreseeable economic environment. And that translates into reductions of AUMs, and that is an economic reduction of resources that they have available, and it puts more pressure on the economic viability of these agricultural communities.

I want to close by asking you to do three things. Number one is gather the data on this species because it's not that hard. I've done it and I'm not very smart. But I did 18 ranches in this analysis between breakfast and lunch

on Wednesday morning, so it's not that hard to do. And I would invite anybody putting their data in this sample.

Number two of which I would ask today that you propose a plan to address the continuing viability of these agriculture producers.

And number three, recognize that the human ecology of our communities deserves at least as much respect as the wildlife ecology, and maybe even more. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Our next speaker is Dorothy Milek, Thermopolis.

DOROTHY MILEK: I'm Dorothy Milek from Thermopolis. And I worked on the commissioners' appointed committee to go through the book, and I was really glad that I did. Since I've known about this study I wanted to study it myself but it was too daunting to look at that book and try to go through the whole thing myself. So it was a real opportunity to be able to break into groups and each of us take part in this study.

I appreciate your being here and continue to appreciate the fact that there's been a lot of work done by the BLM. And I think that it's a hard situation people are in. And I realize there are a lot of people out there that couldn't care less about what we're saying here today, and I think that's part of the trouble.

I do want to say that in the 1700s there was a Frenchman that visited the United States. And he said at that time, I'm not exactly sure the percentage, but it was something like when 70 percent of the people of a country are government employees, then you no longer have a democracy. And I think we're rapidly approaching that. And I don't think that's any one person's fault. I look at you people as neighbors rather than adversaries, but some way we have got to cut back.

In a time when the United States is so deeply in debt, as has been noted over and over here, I think your statement is and shows that you are going ahead with perhaps programs that are too expensive at this time.

And I'm a recreationalist. I've enjoyed hunting with my family. I come from a ranching family here, but my children are employed in the oil and gas industry. So I have many mixed emotions about this booklet that you have put out.

First of all, I do not want to see the public lands sold, which has been advocated by some because it's the only place for people, the recreationalists like myself, to go where they can move about freely and not worry about it. However, I don't think that recreation is one of the most important things in the world. I think livelihood is, and I think that's one of the things that we've had to

consider here. And frankly if the wetlands sold, I do not think that we should kid ourselves, these local ranchers are not going to be the ones that buy it. It will be purchased from people with lots of money who will keep all of us out.

I do want to say that in our area, at least in Thermopolis, we're talking about retirement. A lot of people are wanting to come to this area to retire. It's a lovely place to be, no crowds of people, but if the in economics continues, there will be no one without a lot of money who can retire in Thermopolis or Worland, because there won't be -- we won't be able to pay the taxes that will have to be paid. Without oil, we're lost. And I think we have to look down the road. We need to look at the future, because some day there won't be any oil. What are our children and grandchildren going to do? And I think that is something that in a way the BLM has been looking at themselves.

However, at the present time I do not think that we can stand to have oil not be -- not have exploration. And you will have to excuse me, I can't turn in my notes here because I've scribbled over the top of them several times today. So I am kind of jumping from place to place.

However, I do think we need to keep the quality of recreation in Wyoming. This is why people come here. This is why I enjoy being out, as I love the isolation. I like

the vastness of it. And I do think that we have to be careful that our oil industry doesn't -- okay, one minute, all right, sir -- that it doesn't just destroy some of the things that we like. But I think that the mitigation process can take care of that.

I would like to address one of the things you have proposed, it's doing something at the GRAO Coal Site. And I think that's a good proposal. It's an acceptable area, it's a place where people can go to learn about the history. The same thing with the oil, you have proposed putting some recreation areas in the oil interpretive areas, in some of the oil areas. I think this is great for the larger oil fields, but I do not think that it's viable for small inaccessible areas. I don't see going into these inaccessible areas, drawing into them, where it's going to cost so much money.

The Meeteetse rock area is another place I would like to see access to, but I do not want to see development there. I don't think the cost to patrol those areas is going to be feasible. I think that you have to protect them sometimes by keeping them isolated.

I have a final question on recreation. You have a map on page 120, and I do have some questions about those areas that are called Semiprimitive Non-motorized Recreation, Semiprimitive Motorized, Roaded Natural, and

Rural areas. And I think those are found more on private lands than they are on public. I would like you to take a second to look at that map. Thank you. And I will get a written statement to you.

(Applause).

MR. DANIELS: Thank you. Craig Griffith? Craig could not be here but he submitted comments. Okay. Allan Howard.

ALLAN HOWARD: When I first started my study of this EIS I went to Websters and looked up the word "multiple," and it reads as follows: "a: consisting of, including, or involving more than one; b: many or manifold; c: shared by many; or d: having numerous aspects or functions. It should be obvious, therefore: that multiple use of public lands means that the land has more than one use, that it is shared by many, and that it has more than one function.

I think we have all agreed, or most of the people agree here today that the Bureau's definition of multiple use and the definition of the community at large, at least in Wyoming, is not the same.

Over the last several decades, public policy regarding public lands has shifted from a concept of true multiple use to the current policy which increasingly separates out parcels of public land, isolates them, or, by

means of a variety of increasingly onerous restrictions, partially to the Bureau's way of thinking, if you have a large parcel of public land, for example the Grass Creek Resource Area comprising of approximately 966,000 acres, and you divide those lands into numerous single use sectors, you therefore have multiple use.

It is accurate to say that parts of the public land do enjoy true multiple use. In a typical oil field, for example, there may be oil production, cattle grazing, hunting, sightseeing, wildlife habitat, and wetlands all using the public lands at the same time in the same area. This is multiple use in the truest sense of the definition. The trend, however, over recent years has been to decrease the opportunities for true multiple use and replace them with more and more examples of single or restricted use.

When laws and regulations are passed, formulated, or interpreted in such a way that limits the true multiple use of the public lands, then all of the public suffers and pays the price.

Wyoming has long been considered one of the top six or seven oil producing states in America. Oil companies did not place the petroleum reserves here and then decide to come and produce them. The oil was here. It didn't choose to be here, it's just here. And if the federal lands become

more and more restricted in use, and that certainly is the trend, the economic impact on the states within whose borders the federal lands exist, becomes more and more devastating. Not only are local economies impacted through lost tax revenues and fewer jobs for their citizens, but state and national economies are impacted as well. Every dollar, or almost every dollar that flows into federal coffers come from somebody, or somewhere, in some state. Increasing restrictions towards multiple use of public lands is destructive of the economic well-being of the federal government, as well as the state and local governments.

As I mentioned earlier, the Grass Creek Resource Area contains 966,000 acres of public surface lands and about 1.15 million acres of federal mineral estate. Of those acres, 595,000 are restricted to oil and gas development in one manner or another, whether that restriction is by means of no-surface occupancy restrictions, controlled surface requirements, or other types of restrictions, the fact remains the same. Out of that 595,000 acres that we're restricted from developing, 485,000 -- this comes out of your own documents -- 485,000 of those acres have a moderate potential for the occurrence of recoverable mineral assets. That's 90 percent. Out of that, 159,000 acres make up the non-surface occupancy lands and controlled surface occupancy lands, and 147,000 acres or

92 percent have a high to moderate potential for the oil and gas occurrence. It is not known how many of the 339,000 acres make up air and gas which you have placed rising restrictions on. Seventy to 75 percent of those lands have high to moderate potentials for occurance of gas and oil. The effect is that of the 485,000 acres, 80 percent of those restricted acres have a high to moderate potential for oil.

As you look through the documents there's not one paragraph, there's not one sentence, one phrase, or one word that encourages development of those assets. I understand and appreciate the fact that you feel you have to come forth with a balanced document to meet all the public. If that's the case then you have failed, because that document increases the uses of the environmental concerns and not one issue does increase the use of oil and gas, or grazing, it detracts from these as it is not a balanced approach. It is set up for the environmental movement, and it seems to me that the intention is for the regulator agency managers to eliminate oil and gas potential on these lands. If this policy is put into effect and others like it down the road, it will not be very many years before there will not be any oil and gas production on federal lands at all. Thank you.

MR. DANIELS: Kathleen Jachowski, Cody.

KATHLEEN JACHOWSKI: Thank you. My name is Kathleen Jachowski, and I am here today as a member of the

Greater Yellowstone Coalition. You will probably not be too happy, but that's unfortunate. The opportunity to have this much needed public hearing should serve as a clear message to the BLM, that citizens of the counties involved take the contents and intent of this DEIS very seriously. Unfortunately, the citizens seem to have taken the impacts more seriously than the employees of the BLM, entrusted to develop such documents.

Simply, the Draft EIS does not offer an adequate range of alternatives as required under NEPA. Table 2, Comparisons of the Alternatives, explains why. Out of the 844 possible alternative comments that were possible to compare the alternatives with the Preferred Alternative, 617 all said, "Same as the Preferred" Alternative. Clearly this is a transparent attempt to follow process and produce a meaningless DEIS product. In any final document that does result from these efforts, know now that the public will not accept eye wash to substitute for needed real and high caliber intellectual effort.

Secondly, culture and custom as it relates to the socioeconomics will hopefully be vastly improved as a result of the public's overriding concern, and needs to bring insight into this continuing process. The records should show that this member of the public wants BLM employees to demonstrate understanding and insight into these concepts.

While the public welcomes the opportunity to provide needed information, it does not want to be astounded by any DEIS exhibiting a lack of understanding of both the NEPA process and the concepts involved.

In conclusion, I would like to see the final document put forth a couple of alternatives that call for increased commodity activity. There is no justification for a battery of alternatives that do less. A full range of alternatives by definition would include such consideration. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Dennis Jones, Thermopolis.

DENNIS JONES: Thank you for this opportunity to speak. I am Dennis Jones, rancher from Thermopolis and the following are my observations and opinions concerning the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement.

On page 17, Concerning Rock Art. I have seen some petroglyphs on our land disappear in my lifetime, due to weather and time. To remind them for history we take chalk dust and fill the indentations, then photograph them. This seems to me to be a more economical solution, than trying to make them available for the public and then protect them from the vandals.

On page 37, Livestock Grazing Management. Concerning elimination of livestock grazing on the public lands along the Big Horn River, the buffalo and game animals all grazed the river bottom extensively with little or no harm done. I see no reason to exclude livestock grazing from this area.

Page 39, Livestock Grazing of Dormant Plants. Winter use can be much more than 60 percent. I attended a meeting where the previous Worland district director stated that 80 percent and possibly even 90 percent was not considered harmful.

On page 40 to 41, Livestock Grazing Restrictions for sheep. These restrictions are outlandish and unnecessary. When the Wind River Canyon planting of Big Horn Sheep was completed your office and Wyoming Game and Fish personnel indicated no impact would be felt. Sheep ranching has a greater economic input in the area than antelope and Big Horn Sheep hunting.

On page 47, Off-Road Vehicle Management. It is implied that access is secured for Red Canyon Creek. This is not so.

Page 49, Recreation Management. The proposed trail head at Red Canyon Creek, when access is secured, is approximately 200 yards from a sage grouse lek.

Page 51, Recreation Management. I am curious how

an interpretive site for the Mexican Pass Trail would be developed on the Wind River Indian Reservation.

Map 3, Cultural Resource Management Area. The Mexican Pass Freight Road did not go where indicated.

Map 15, Off-Road Vehicle Management. My Red Canyon private land is included for ORV use and no access, as yet, is available to the public.

Table 9, Watersheds. The great majority of the watershed area for Red Canyon Creek is on the Wind River Indian Reservation. I estimate at least 90 percent. Your document indicates 66 percent of the watershed is on BLM lands which is very much in error.

Table 10, Stream Classification. Red Canyon Creek is normally dry and there are no fish. It's listed as a type four fishery.

Page 179, Socioeconomics. The difference may be insignificant in the alternatives, but the economic impact in reality would be huge. This document, if enacted, would be devastating to the entire Big Horn Basin.

Page 226, Wild and Scenic Rivers. Red Canyon Creek is designated as free flowing. This is in error, as the major water source is diverted for irrigation during the growing season.

Page 246, Actual Grazing Use. Actual use is incorrect for allotment 02505. It is considerably higher.

Page 254, Stock Levels, Actual Use and Suitability. Allotment 02505 has already suffered a 47-1/2 percent reduction and the table indicates some more is desired. This is unwarranted and unnecessary.

In closing, something is badly out of whack when Wyoming Game and Fish game number goals are used to set the number of AUMs ranchers can run. It hardly seems fair that an agency that lives or dies by the number of licenses it can sell is deciding the viability of our ranches. Thank you.

(Applause).

MR. DANIELS: Thank you very much. Martin Dobson, Burlington.

MARTIN DOBSON: I'm Martin Dobson and I live in Burlington.

(Off the Record).

MR. DANIELS: If you can take your seats. Martin, we'll try again.

MARTIN DOBSON: Well, I'm thankful for this opportunity to take a minute and to have the hearing that we have today.

I am most appreciative of the representatives that we have had come before us today who are elected officials or representatives of elected officials that included federal representation and state representation with Barb

Cubin's office, and Jim Geringer, and our county commissioners in each of the four counties who got up and spoke, and some of the local mayors, and other elected officials. I see that as a very important step in the representation process.

It was very clear what their message was, very defined, and they were all in very un-unique harmony on this. They were lined up in the same direction. And that fact alone speaks very strongly, but the strength of it is that the things that they speak have been spoken before. And it's obvious that someone wasn't listening or we wouldn't be to the point that we are in this process right now. This hearing would not have occurred if they had been incorporated into that process in the beginning.

They are elected officials, they are representatives, they have land-use planning people, they have expertise, and that they also talk with their constituents. And I suggest to you that a hearing has to be more than just hearing the words and letting it roll off like water off a duck's back. They have to be input in terms of not just having the input laid out, the input has to be applied, taken in, and used. I think that that's the strength of this and that message should be heard several times here, because that seems to be what's lacking in this whole thing.

The comments can go on here for the next 6, 10, 12, 25 hours, whatever you want to sit here for, and if those comments are not used again -- and I will submit to you that they have been ignored, and that they are many and numerous -- and as long as they are ignored and the people are ignored then this process will go on and it will come to again a lousy conclusion.

I do have a few specific comments I would like to put forth. The economic impact to the oil and gas industry of this kind of proposal is severe. The mitigation for environment and disturbance impacts are already taken care of as have been indicated in Section 6 of the lease agreement. And if there is mitigation that needs to be done adjacent to state lands, the DEQ and other environmental offices within the state, the county also deals with this, can deal with this.

I would suggest to you that the elected officials such as specifically our county people should be incorporated into a new alternative, and that would be the one I would support, because I haven't heard anything that they have proposed today that I would not support. I'm behind them.

When it comes to range management, the wild horse is not a wild horse and I hope that someone talks about that. He is a cultivated horse. I have neighbors that have

been out on the range when they have collected them. I understand there's only Paint studs that are placed out there. It would be interesting to see if we had a coyote population out there that were only selected for a Paint or Pinto coyotes as a management strategy. Well, they are not wild. Those horses are not wild, guys.

You talked about this great resource we have out there for all our wild animals. Well, a lot of those deer, antelope, and other things winter on the ranchlands or on the farmland adjacent to the BLM lands. I have approximately fifteen miles of fence line that borders the BLM. You don't maintain the fence lines and neither do your (quote) "wild horses," your cultivated horses. They tear them down.

I have a section of ground that I have been trading -- trying to trade the BLM for out -- about three miles from my house into BLM country. I've been trying to trade that for three generations. My grandfather started that process and we have been turned a deaf ear for three generations. Not even a, "Well, let's work on it and see what we can do." It's more of a stonewall. Very frustrating. Those areas have access, and that access comes through my property. Now you may have land out there, but it can be fenced off and county roads can be closed so that the only access would be by helicopter.

I would suggest to you that your proposals to recreation have costs that you have not estimated or placed out here. Do I still have one minute?

MR. DANIELS: No, your time is basically up.

MARTIN DOBSON: That's time? Okay. I'll wrap up my comments. I went through this and looked through the alternatives. The Preferred has restriction -- the verbiage is restriction, limited, and protection, as its common phrase throughout this Preferred Alternative. And I counted up over 70 places where that term occurred. I've also highlighted in the recreation management area, and you can do the same in your EIS, each place that it says that access will be granted, development will be included, a scenic interpretive loop will be enhanced, and facilities will be established. Let's see what the costs of those are. That's the only place in this whole thing where I see that kind of addition.

And again, I will submit my written comments to you at a later time since we have a few more days. I appreciate the opportunity to do this. And again I stand behind my county commissioners who represent me on this. Thank you.

(Applause).

MR. DANIELS: Thank you. Monte Dobson, Cody.

MONTE DOBSON: I'm Monte Dobson from Cody.

I've been raised in this country, been here all of my life. And I would like to put to rest the talking of this romantic idea of these wild horses where all this money is spent in this area.

Like Martin said, those horses are not wild. Back when I was a young man there was three times the amount of cattle running in the Fifteen Tatman Area, Fifteen Mile country in the Tatman Area. And not only was it that, but the wild horses -- there was wild horses then. And there was the Pitchfork ran a lot of sheep down in that country at that time.

And then the BLM, because of the dry, the years were nothing drier, the BLM said, "Well, now, we have got to cut down on cattle and we have got to find some way to get rid of some of these horses. And they come in the period of three years we -- they cleared off better than 6,000 head of wild horses. There was eight head left on Tatman Mountain, there was 15 head left over by the Buttes, and those were hunted down and shot. There was no more wild horses in that area.

Now as years went by and tractors come in more prevalent, people didn't know what to do with a lot of their horses. They didn't want to sell them, but they kind of wanted a place to put them. Well, I had a cousin and a dad and some of the other neighbors, but this cousin in

particular, and he put these horses out on his ground, of course, like it's been stated, horses don't think much of fences and they tear them down. They got out. They were -- I helped them round them up once. And the colts were taken off and put back out.

Okay. Then the BLM come in and said you are going to have to clean up these horses and get them off there. A hired horse wrangler was brought in and he took off two truckloads which wasn't half of them. The other horses were left and the BLM took over the management of these horses. And this is where this herd of horses came from today. I know a lot of these horses were Paints and so forth as has been stated.

Now you can go down to -- the oldtimers used to have a name for these type of horses, and you can go down along the different ranches and you can see them all over. They are called Broomtails. And that's the only herd that I would address them by. These horses were not particularly skilled in anything. They are too small to be working horses, and they weren't a satisfactory riding horse. They have no gate. They have -- they were rough to ride and that's why he turned them out, because he didn't want -- he wasn't particularly proud of them. He run them in, took the colts off and sold them as poundage flesh for a while until the old tame mares died off, then he couldn't get them in.

So this is where this bunch of horses came from. And this is where all this money is being spent now as a wild horse refuge. And I do not think that it justifies that money be spent on horses of this caliber to be able to spend this money and then say, tell the public they are wild horses. They are not. And I just wanted to put that before you. Thank you.

(Applause).

MR. DANIELS: Thank you. Our next speaker is Gary Anders, Greybull.

GARY ANDERS: I'm Gary Anders of Greybull. I run a real small cow/calf operation in the Grass Creek Resource Area, all on private land. Unlike your Environmental Impact Statement, my remarks will be very brief.

It's my feeling in the entire Grass Creek document is totally invalid, and just another step in a well-organized effort to deceive the American people. By the Bureau of Land Management's own admission, the present management is working fine. The only reason for changing it is to exert tyrannical control over the American people. To subject free people to absolute control by our all-powerful federal government you must first remove their rights and freedom, remove their free speech by making it politically incorrect and unlawful to express an opinion contrary to the

federal government, remove their right to protect themselves by taking their arms away, remove their rights to own and control private property or lease state land. There's no such thing as federal land in Wyoming, except military reservations.

The Endangered Species Act and Ecosystem Management Plan, such as the Grass Creek Plan are only a ploy to control the American citizens by removing their constitutional rights. The ESA and Ecosystem Managements may have had some merit, but this has been perverted by all reason -- beyond all reason by Secretary Babbit and President Clinton. I am certain that Mr. Babbit or President Clinton would not recognize a Bruno Spring Snail, or a Small Garden Mine if it appeared on their dinner plate, but they would readily shed down millions of acres to protect these or any other fictitious species that they feel is endangered. This is not about protection, it is about control of the rabble, that is the common American people. After all, the average American citizen cannot be trusted to make their own decisions. This must be done for them by the Washington elites.

We have heard from the Governor of Wyoming and our senators and representatives from all levels of government; they unanimously oppose this document. Therefore, the Grass Creek Plan violates the Tenth Amendment to the United States

Constitution by usurping the control of Wyoming state land and is therefore invalid and illegal. Thank you.

(Applause).

MR. DANIELS: Thank you. Our next speaker is Lois Herbst, Shoshoni.

LOIS HERBST: That is Shoshoni, named after the tribe on the Wind River Reservation. I ranch in, right at the southern border of your Resource Management Plan. I also ranch in two other counties and several different types of your permits. And I haven't been happy with any of the treatment given to ranchers in the past few years under the plans. I am speaking today as Private Lands Chairman with the Wyoming Stockgrowers Association. I also served as President of the Fremont County Farm Bureau, and I am an elected member of the Lander District Wyoming State Grazing Board representing permittees on Copper Mountain, which is to the south of your plan, and in some of your plan.

I will be sending you a written analysis. I hope to outdo Dennis Jones, my neighbor on Copper Mountain. He just gave an excellent analysis. But I don't think you have adequately addressed the private lands issue. Looking at your land ownership patterns on page 109, 111, and your Appendix 3, Table 3-1 it refers to the private lands in grazing allotments, does not address the impact of those private lands. And there is other private lands that aren't

even tallied in. And these lands that aren't in the grazing allotments will have a higher tax base because of your reduced income from commodity production on the federal lands.

Your riparian areas on page 198 gives no indication of how much of that riparian area is on private lands. Throughout the state it is running 70 to 75 percent of the riparian areas involve private lands.

Wildlife habitat, what is the basis, the law that allows Game and Fish to dictate the numbers of wildlife running on the federal lands. I asked several years ago what the quota had been for elk on Copper Mountain. When they introduced the elk they got permission from the ranchers' cooperation. There was to be a certain number.

Well, the good old ranchers didn't go home and write down numbers, there was nothing in writing, because it's not in the files of the Game and Fish Commission. And talking to one of the oldtimers I was told that it was 75 head of elk. When it reached 75 head they were -- that was it, there was to be no increase in that herd. And in the drought of 1988 my husband wanted to rest our Copper Mountain land, which only 18 percent of it is BLM land, and we leased land elsewhere. And neighbors who have time to go do things like this, they enjoy hunting, but they were just up there looking around in the summertime, counted 300 head

of elk in that pasture that we were trying to rent. The neighbor thought it looked so good he turned his cattle in on it with the elk. Not the neighbor who was speaking tonight, either.

One of the things I was interested in was the basis for this whole plan. And I read your planning team reviewed the executive orders, the acts involved with grazing and so forth, but I just wondered if they reviewed the portions that dealt with, for instance, the Grazing Taylor Act was enacted to give stability to the livestock industry and the communities. There's requirements to consult, coordinate, and corporate. I think that's the three Cs. I get them mixed up and have trouble remembering them, but they are definitely -- there was a basis for working together. And that basis is leaving us. Everything that comes out is punitive, if in a reduction in our rights, it's as though they are trying to lower the values that we have in our grazing allotments by saying, "You are serfs, you are not the ranchers, the producers that you think you are."

And another thing, nobody ever put this government -- they were not supposed to be owners of real estate. When our Constitution was written and our country was formed the basis was the right to have private property and use it for free enterprise. They did not want the government to own

more than a third of this country. Thank you. I really am glad to have the opportunity to speak here tonight and I don't envy you your jobs one bit, thank you.

(Applause).

MR. DANIELS: Thank you very much. Bill Wilson, Tom Sleep, Brian Webster, Meetaatse, John Preis, Emblem.

JOHN PREIS: I am John Preis from Emblem, a rancher there, also Vice President of the Big Horn County Farm Bureau.

I'd like to preface my remarks by saying that the people here today speaking to this proposal would prefer to be doing something else, that this is a giant waste of time, but something that we feel strongly enough that we need to do.

The fact that we are here speaking against your infringement of our rights speaks for itself. And the fact that we are on our good behavior does not mean that we are not vehemently opposed to these proposals. In other words, we're not using the words B.S., but it is in the back of our mind.

I wish to thank the BLM for taking the time and making the effort to give the area people a chance to respond to the various proposals which have been presented concerning the Grass Creek Management Area.

Some hearings are necessary so that we are all aware of what the "our." is thinking. I do have one suggestion, though, concerning hearings, and that is that there be some listening on the part of the BLM. One suggestion is that you listen to some people who have a vested interest in the area and are directly affected by any management decisions.

Secondly, the economic impact of your decision be positive for both sides. Any reduction in income to the users of these lands is a reduction in the tax base, which is a reduction in money that can be spent in managing the area, therefore reducing the economic activity. It will put us both out of business.

Over the past several years we have had area hearings on reintroducing wolves in the Yellowstone area. There were at least three hearings in three states on three different occasions. I did not attend all the hearings, but the ones that I did attend were 98 percent against any reintroduction plan. Yet you say the majority of the people wanted the reintroduction. The majority of people were not directly involved. The majority of people did not have a vested interest. I would not be opposed to having wolves in downtown New York since I have no vested interest in the outcome of such a proposal.

It's time that the BLM and other government

bureaucrats begin listening to the concerns of the people involved and review the basis upon which this country was founded, namely, "Of the people, by the people, and for the people." Thank you. And you do have a copy of this already.

(Applause).

MR. DANIELS: Gordon Preis.

GORDON PREIS: Hello, my name is Gordon Preis. This is going to sound kind of redundant because it's been said over and over, time and time again today.

In reference to the Grass Creek Resource Management Plan, what I understand of this proposal is that the BLM is trying to take our land and change it from a multiple use to their single-use plan. Their proposal was to run wild horses for the amusement of tourists and preserve the natural beauty of Wyoming Wild.

I haven't been able to do a lot of research myself on the Environmental Impact Statement due to such short notice, but I'm sure that the BLM has done an quite extensively and quite poorly as I have understood today.

I ask the question, have they looked into the economical impact that this proposal would have on the State of Wyoming and its people. This proposal will eliminate mining of many minerals, oil, for which is quite important as far as the state's monies. I'm not sure of the numbers,

but a great sum of money is collected from this which is put into the state's budget. Without this our state will have to make up differences somewhere else because we are already hurting for money.

They also propose to take the cattle off the range because of environmental hazards to the preservation of the landscape. They try to tell the people that the reason for all the ailments of the landscape is directly related to the cattle; overgrazing, trampling, cattle trails, etc., etc. They don't tell that we have been through a drought or extreme weather conditions. And they always take their data at extreme times. They don't tell you that the reason the rancher doesn't do a lot of management is because of all the rules and regulations that he has to follow, which doesn't let him do anything. And the people that manage the land, the BLM, don't have a clue as to how to best manage cattle, and won't listen to someone who does. So they blame it on the cows.

The cattle and the cattlemen do good things for the range and the wild animals that live therein. For example, one of the best grass and nutrient feeders is placed on the back of a cow. They are quite generous with it also. The cattlemen also provide water at different locations where water isn't normally accessible, and the wild horses and wild animals also take advantage of this.

Without this it would either eliminate some of the range that the wild horse could use, or cost the taxpayer money to provide and maintain them. Another advantage of having cattle on our land is the money that the BLM and the state get from the leases which will have to be made up somewhere else, if the cattle are taken from the land, which will increase taxes.

Now, if the cattle are taken from the land it will make the cattleman have to scale down his income, and when revenue goes down he pays less in taxes, state and federal, which is less money in the kitty. He or she spends less money in town at your business, doesn't need all them parts and machinery at your businesses, your income goes down, he has to lay off workers, and it goes on and on. The miners and the oil companies fit into this category also.

You people that feel that this proposal won't have any affect on you, either way it will. If this proposal goes through, the state will have to make up the funds somewhere else, and it will affect everyone in the state and higher taxes a lot higher.

What is it in this proposal for the state and the people? The BLM says that this proposal will help the wild horse herd and draw tourism. This proposal will create a few jobs, but they are all tax-paid jobs. The horses also need to be taken care of, so that will cost more tax money.

They are proposing to build roads and rest areas for the tourists which will cost tax dollars and create a few more short-term jobs that are also funded by tax dollars. There's a lot of expense with no income to back this expensive proposal. We already have the first wild horse herd to be controlled by the government living in the Pryors and it is expensive and not managed very efficiently, and it doesn't bring in very many tourists. We also have the Yellowtail Dam and Big Horn Recreational Park which brings in very little tourism compared to Yellowstone. Our big drawing card is Yellowstone, and that is why the people come here, not to drive through the sage brush to see wild horses. They have to drive through the badlands to get there on our present highways and they are not going to schedule another day to drive in them some more. A lot of tourists that I know would like to see, and come to see cattle, cowboys, and not wild horses, sage brush, and dusty dirt roads without cattle.

With all this expense there's no income to support this proposal, not to mention the money that would be lost by the state and BLM eliminating mining, oil, and grazing fees. So now Wyoming is in this big hole, not enough money for the regular things that the state presently does, But more expense to add to it. So what happens, they come to you for more taxes. Remember, the state and federal

government has no money. It's our money they use, and we don't have any more to give. You have a copy already.

(Applause).

MR. DANIELS: Thank you. Dick Loper, Lander.

DICK LOPER: Gentleman. I'm Dick Loper, I'm here on behalf of the Wyoming State Grazing Board's Central Committee. I live in Lander and work for this group as a federal lands consultant. There are five boards around the state and they are primarily set up to provide some technical advice and assistance to permittees on BLM-type problems.

I've been doing this for about 18 years and I must tell you that I don't think I've ever come across, and I've done 93 documents now in 18 years, and I haven't yet -- this is -- this is the worst with respect to being overly biased against the commodity users. I just don't understand why the balance isn't there that we normally see. And it's going to become almost impossible, if not -- well, it is going to become impossible I think to come up with a balanced final product final RMP, final EIS, unless there's some balance taken from these public comments.

I will give you a copy of my written comments here and I will just paraphrase some parts of it. Most of the narrative in here on the technical portions of the range management portions which I have some qualifications in, I

don't think represent the current state of the art, and it's a frustration to range management people, range scientists outside of the agencies. We just do not understand why the agency seems to be the only foul ball when it comes to being able to read literature and understand what the literature says and interpret it on federal lands. And there shouldn't be this dichotomy against the rest of the profession in the agencies, but there seems to be and I just don't have any explanation for it.

But for example, the ranchers that reduced their livestock numbers during the drought period, now those AUMs during that drought period are used as a benchmark for how many AUMs people need in this area. The BLM people know better. They know this is not the number of AUMs that people need to run a sustainable operation. Ranchers took a reduction during this drought period. They practiced proper range management, and now it's kind of ironic that that practice is now coming back to haunt them in the proposed action by the BLM saying that this is all they really need because they haven't used any more than that.

The table in Appendix 3 -- Appendix 3, Table 3-4 is an Ecological Condition Class and Acreage of Public Land by Allotment. And I went back to the 1982 Grass Creek EEI, this yellow book we call it, and there's a similar table in there. And I tried to compare the numbers both on acreage

and range condition to see if I could determine whether or not there might have been either progress or regress in some of the range conditions, and I can't even get the law about acreages to match up allotment by allotment. So that throws everything into a tizzy because then you cannot go to range condition estimates by acres because the acres don't even match up allotment by allotment. And sometimes they are off by many thousands of acres. So it's difficult for some of us who review this document to be able to compare the two, 1982 document to now. We don't know which one is correct. One of them is wrong and one is correct. We don't know which one it is.

Table -- Appendix 3, Table 3-5 is on Suitability. You've heard some comments about that today and you heard some comments from me before this particular hearing on that. I think a lot of us outside the agency were very shocked to see this information in this draft because it first showed up, to my knowledge, in the 1982 document, once again this yellow document. The technology used in develop the information in '82 was an office procedure, it wasn't a field procedure. It was directed by the Washington office of the BLM as a field -- or excuse me, an office procedure. And the criteria that were provided were discounted by the range professional almost in total.

In fact, my understanding is that one of the high

level officials in BLM in the range staff actually was transferred because of his adamant support for this field technology. And here it shows up in this document again. And it's just amazing to me that someone doesn't have the perspective on that particular item, the suitability item, and allow it to go forward in this particular document, for whatever reason. It's misleading to the public. It's on a fail technology and it should not be here. And someone should honestly be embarrassed that it is here.

Table 3-6 on the subject of Utilization. Myself and other technicians in the state have provided a number of current literature to the BLM here in Worland and other offices in the districts here in Wyoming on utilization. I can say with certainty, because I know this information rather well, in fact I'm the one that sent it to you most of the time, that basically the current state of the art on utilization is that it's appropriate to consider it if you manage the extremes: manage too much use, manage too little use. And everything in between doesn't matter. If you try to manage the 40 and 50 percent utilization levels it's a waste of public time and money because it doesn't change any vegetation. It's just an exercise in futility. And we don't understand why once again the agency people who read these things, look at your articles, don't come to the same conclusion the rest of us do. It's not a bias, there must

be something else going on that we just can't figure out.

The wild horse expansion proposal in here is -- well, in my opinion is just simply against the law. I don't see where you have any authority whatsoever to double, basically double the size of the horse herd area. The 1971 law says you are to manage as best you can the numbers of the horses in the areas that they existed in 1971. And I can tell you from communication with these people here and with BLM officials that your proposal is outside the scope of your authority under that law. And you have got to give that some consideration or there might be some legal action on that, not from the State Grazing Board because we don't do that, but somebody is going to pick up on that.

We are in support of the proposal that talks about the rotation of the Salt Desert Ranges. We think that is in fact an appropriate evaluation of those ranges. They should be managed in a rotation system and not season long, and not the same time every year. But we do think that's an appropriate thing.

On a more personal note, very quickly, I'd like to have the final document represent -- tell us what the criteria are for reviewing public comment. You've heard public comment today rather consistently. You probably get some public comment from other points of view, but not here at the hearing today. But it's obvious to all of us that

it's going to be an overwhelming imbalance against this document. And yet we don't know what the criteria are for review of our public comment. We don't know if it's just going to be a waste of time, or whether or not our comments are in fact going to be used by you. And we would like to know what the criteria are.

I was told by a friend of mine in the Rock Springs BLM District that was on an EIS team down there, disturbing comments he told me. He said if somebody on the team doesn't like the comment, it doesn't go anywhere. And I've tried to read the BLM documents that provide the guidelines for interpretation of public comment and they are not there.

So we'd like to know. I'd like to know on behalf of the State Grazing Board and all the permittees, how do we know how you are going to take a look at our public comment? Is it going to make any difference at all? How do you judge?

In all honesty I've sat back there and watched your foreheads get a little red today and your ears get a little bit red, and I know some of you personally. And I don't think that if you individually had sat down for the purpose of writing a document that you would have come up with this kind of a document. And so it's incredibly disturbing to most of us that a team of BLM employees could get together and come up with this, when individually we don't think that they would. We know a lot of them. They

are good people. And how in the world can you come up with this kind of a document that causes this kind of reaction from the state and from the Big Horn Basin. Please go home tonight and reflect on that. We need you to act like humans with compassion, not like bureaucrats. Thank you.

(Applause).

MR. DANIELS: Thank you, Dick. Keith Hamilton, Hyattville.

KEITH HAMILTON: I'm Keith Hamilton. I'm a rancher from north of Hyattville. I'm here today on behalf of the Wyoming Farm Bureau. I serve as their vice chairman of their NER Committee. And we have come up with some general comments and observations I'm going to present here today and reserve the right to bring some later ones before the deadline.

The Draft EIS treats agriculture as second-class users. On page 7 it says, "The livestock grazing practices that are compatible with other resource management objectives." We question why livestock grazing is being singled out to measure for compatibility.

Discrimination is continued on page 14, paragraph one, the Draft EIS doesn't consider the plan for Wyoming's agriculture industry 1990 to 2000, hereafter referred to as the plan. The plan lists eliminating factors for beef production, federal policies which limit grazing. This is

on page 24 of the plan. And federal land policies limit expansion of sheep ranges, on page 37, as a limitation for sheep production.

One of the plan's goals for the beef industry is ensure no net loss in federal and state AUMs. One goal listed for the sheep industry is increase stock and sheep numbers to one and a half million head. This document appears to ignore this plan and instead of seeking to enhance livestock production as outlined in the plan seems to reduce or eliminate livestock grazing.

The Draft EIS suggests improving (quote) "ecosystems" (unquote) as an important management consideration, but doesn't provide ranchers with maps outlining which ecosystems will be managed.

The Draft EIS on page 8 discusses the development of mitigation needs. The document is unclear as to what the BLM considers a (quote) "surface-disturbing and other disruptive activities" (unquote).

It is unclear in the definition section whether normal animal husbandry practices such as fence repair or construction, water development, or even grazing would be considered a surface disturbing activity, and need to be mitigated.

The Draft EIS discusses management for biological diversity without providing baseline data as to what level

of bio-diversity the managers are going to manage for, what measurements will determine whether the BLM is successful or unsuccessful? Is this a ride to the risen management goal?

The Draft EIS on page 35 says that the Management Objective for Livestock Grazing is to, "Improve forage production and range condition to benefit livestock, wildlife, wild horses and watersheds." We find no requirement that wildlife and wild horse management be used to benefit livestock. Why? Indeed we find that in table 16 on page 176 the livestock AUMs will be reduced 43,850, or around 35 percent. We question why this document tries to mislead the public into believing the livestock grazing will be managed to benefit livestock when it is apparent that wildlife and wild horses are the beneficiaries of these reduced AUMs.

We find the document leans heavily in favor of recreation development with no clear indication as to what recreation truly is.

In Table 2, Page 49, the document wants to (quote) "enhance opportunities for primitive recreation" (unquote). The 1990 State Comprehensive Outdoor Recreation Plan, acronym is SCORP, suggests that resident participation in primitive recreation activities is stable to downward trending, on page 35.

The Table 15, Assumption for Analysis by

Alternative for Recreation Management, page 168, also points out the BLM increased camping by 85 percent, hiking by 81 percent, sightseeing by 102 percent at our current estimated levels. Again, the 1990 BCHRP document states that noticeable decreases in camping, sightseeing, and picnicking are noted.

The Draft EIS is inaccurate, incomplete, and inadequate. It needs to be withdrawn and redone. We hope these comments help. Thank you.

(Applause).

MR. DANIELS: Thank you. Paul Galovich, Thermopolis.

PAUL GALOVICH: Thank you. I appreciate this opportunity to comment. I do not have any prepared statement to present to you, although I would like to go on record that I was unable to attend your meeting in Thermopolis back on the 21st. And again my name is Paul Galovich and I reside in Hot Springs County. And I am just an average everyday citizen residing in that county.

And I wish to have go on the record that I am opposed to the present Grass Creek Draft EIS plan. There have been a multiplicity of reasons that have been stated here that I don't need to reiterate, that express my viewpoints.

There are a few things that I would like to

request that you do and encourage you to do, and that is to cater to the Hot Springs County Commissioners and other county commissioners, and their recommendations and proposals. And that is constitutional.

I also, through my study of the EIS, I feel directly that it has a very strong environmental flavor to it. And I wish to point out to you and all those present here the hypocrisy that I see in the environmental preservationist policy that exists in our society today, directly in the United States of America.

It's my understanding that environmental limits as perspective of a global perspective and if you consider it in that regard being a global perspective, the most regulated, and watched and monitored policies of resource use is found within the United States of America. And therefore those proponents of the environmental movement should support resource use in America, should support resource use in Wyoming, and not oppose it, because it can be regulated here.

I work in the oil industry. Oil spills and other hazards are not even measured until they are possibly hundreds or thousands of barrels. We're very well regulated within this country.

And I just wanted to point out that this is my philosophy or my opinion in regard to the environmental

movement, that it is a Hippocratic movement and they should encourage resource use within this country, within the state.

I want to let you know that I am a recreational user, that I intensely use the wonderful outdoors of Wyoming for recreational purposes in hunting and fishing, and to me that would be of no value if I didn't have an income or source of income to be able to go out and enjoy those resources. I feel this will have a direct economic impact within our countries, and I would love to see you address that issue more in more detail as to the affect of economic impact it will have on our counties and on our individual families. Thank you.

MR. DANIELS: Thank you very much. Clara Yetter, Meeteetse.

CLARA YETTER: Clara Yetter of Meeteetse. And I note on page 14, which has not been addressed today I don't believe, Elimination of Timber Harvesting. "Possible elimination of all timber harvesting on public lands in the planning area was considered. However the 14,000 acres of BLM- administered forestlands capable of sustaining forest production need to be harvested over time to maintain a healthy, vigorous forest. Because fire and, to an extent, disease have been eliminated by human influence, the harvesting of forest products helps sustain the ecological

processes that maintain the healthy condition of the forest. "Finally, harvesting forest products is consistent with BLM's multiple use management policy and closure to these activities would be unreasonable and unnecessary." Now you are singing my song.

For many years the Forest Service and I argued about the necessity of harvesting timber, but they didn't sing that song. And I think perhaps the reason that the change has come about is that the timber industry is in its death throes in this area, and they are not of any concern. There is very, very little timber harvesting, has not been for some years. This is to me proof that regardless of who writes these statements, these little books, the intent is to remove multiple use from the State of Wyoming. Thank you.

(Applause).

MR. DANIELS: Thank you. Don Gilbreath, Meeteetse.

DON GILBREATH: Thank you. After reviewing this EIS it is clear that it is an attack on the culture and custom of the public of the West. I feel that the authors of this EIS have lost touch with reality. With the constraints written into the EIS, our tax base and livelihoods will no longer be viable. Let's move forward with progress, not retreat back to the Stone Age. We are

working with renewable resources in our grasslands and forests. Our fossil fuels are an accomplishment of technology and progress.

The millions of pieces of paper this document is written on came from our forests. To deliver these products to us, the consumer, was done by our fossil fuels. The fuel to heat this building, warm our homes, build our highways, and cook the food on our table came from a major undertaking by private enterprise. The major portion of our meat intake came from our renewable grasslands. The excess water that Mother Nature generously gives us, allows us to drink to maintain life, cleanse ourselves, and see in the dark of night. This water also lets us have recreation and to preserve in our dams and reservoirs for periods of shortage.

All these resources are what sustain our culture and custom. Let's not make the way of the progress and the future extinct. These resources help pay the bills. The oil, gas, and coal industry pays the major portion of the taxes in this area of concern. If it wasn't for these industries, landowners and taxpayers, the tax burden would be outrageous. Our tourism and recreation industries would not be able to support our communities. Then the tax base would shift to property owners with the farm and ranch industry picking up the slack. Folks, you're killing our communities and your jobs. Remember, "We the people," are

still paying your wages. The ones that utilize the resources also justify your jobs.

Some comments on some of the proposed actions:

Air Quality. The EPA and DEQ already have laws in effect. We do not need any more federal control or agency involved.

Culture - Paleontological and Natural History. Preserve and protect okay, but don't lock the other resources out. As area can be protected and its resources utilized. By getting public access doesn't necessarily preserve. With public access in the BLM going to be responsible for infringement on private property and state rights? If public access is gotten, wouldn't that be the best place for right-of-ways since the disturbance is already done? Why are existing developments good for history and research and new developments are condemned?

Fire Management. It is a very good tool to help protect the resources. We need to enhance fire management and make it logical and economical. Timber production needs to be maximized to help heal our forests and slash burned to develop our forests to their potential for our wildlife and ourselves, the public. Presently the governmental mismanagement of our forest and grasslands are killing them and our livelihoods. The forests need to be logged and then cleansed by fire. The forest floors are dead and unproductive, and dying of disease. The Yellowstone fires

of '88 were a disaster in one sense, but on the other side, was the best thing that ever happened. From a standpoint of common sense, logical thinking and economics, it would have been better to log the Yellowstone area first, then burn the slash to help it heal and reproduce. But do it over a hundred year period, not five months. Yes, we can work with Mother Nature.

Federal Acreage. Why does the BLM want to increase access to one area and restrict it to others?

Land Ownership. I feel that there is enough federal control over private property. By acquiring more private property it will only be making big government a larger public enemy. Don't take private property and rights away to make ameds for past governmental failures.

Right-of-Ways. Major right-of-ways are along the major routes because of common sense and economics.

Livestock Grazing Management. In the records on page 111 there's 157,375 available AUMs. Let's not start with a lower number and get our minds set on something that's wrong. Wildlife and livestock are compatible. But bias studies by the BLM is not compatible. Key area studies for utilization are very biased and a lazy man tool to prove false statistics. An example would be 1,000 people eating a meal and only 100 people ate the meal or a portion of it. But, these same 100 people all sat at one table and the

other 900 didn't sat at other tables. But by key area selection we got 80 to 90 percent utilization when actually there likely wasn't a 10 percent usage. Yes, this has and is being done. Trend cannot be determined in two to five years. Trend cannot be measured in time of federal employees in resource area durations. Past studies have to be used along with the knowledge of the people that have been on the ground for generations.

Oil and Gas. Let's not restrict the experts from finding and developing our resources by new technology. Remote areas can be developed by new techniques not used five years ago. It can be done to protect the environment and managed for the betterment of all concerned. It will also develop access to public grounds. This cannot be done as long as there is a so-surface occupancy and also time limitations in high geological areas for oil and gas. The wildlife love the oil fields. I've worked in oil fields today for twenty some years. I've lived in an oil field my whole life. And they raise and bear their young there all the time and seem plum happy.

Wild Horses. Yes, I love horses, but I also manage them like the Wyoming Game and Fish manage the wildlife. If I have too many or not enough feed, I sell them to help protect my land and improve my checkbook. I don't take another's rights away for my mismanagement. Come

on. folks, the wild horse overpopulation is a burden. Let's manage them and sell the excess to help the treasury and our taxes.

Recreation. As long as we have multiple use of the public ground we will have recreation. If we start restricting rights, then everyone will soon follow. This is a free country, let's keep the West free and under multiple use for all to enjoy. Thank you.

(Applause).

MR. DANIELS: Thank you. Matt Brown, Thermopolis.

MATT BROWN: The following are my comments on the Grass Creek Resource Area Resource Management Plan Draft Environmental Impact Statement. My name is Matt Brown. I reside at Owl Creek Route, Thermopolis, Wyoming, for the past 43 years.

I appreciate this opportunity to comment on a government document that will adversely affect my family and community.

I am the fourth generation of my family to graze public lands in the Grass Creek Resource Area, and to provide stewardship of these lands.

I believe in the multiple use of public lands. I believe that wildlife, recreation, minerals industry, and livestock grazing can and do co-exist on public lands. Most

of my comments are tailored towards the livestock grazing portion of this document.

The Preferred Alternative for Livestock Grazing Management is covered from page 35 through 42. I totally disagree with the Preferred Alternative as it is written in many areas.

Page 36. The level of actual livestock use would not exceed active preference. Current active preference is 101,451 AUMs. Why wasn't this number part of your Appendix 3, Table 3-5?

Page 36. Why wasn't there input from the permittees before their allotments were placed in the M.I.C. categories?

Page 37. And I quote, "Authorized livestock grazing preference may be reduced in areas with excessive soil erosion, poor vegetative condition, or as necessary, to provide forage for wildlife and wild horses, or to improve the visual quality of lands with high recreational value." This paragraph should be stricken from the document because the first part ending with "vegetative condition," is provided for in the previous paragraph. The second part of the paragraph unjustly restricts the multiple use of public lands. Livestock and wildlife have co-existed, and as a livestock grazer, I don't think it is appropriate to cut livestock numbers because someone has arbitrarily decided to

increase wildlife numbers, especially when this action will adversely affect my right to use my deeded lands within these allotments.

Page 37. Livestock grazing monitoring should be done only on BLM lands within the allotment, not private lands.

Pages 37. And I quote, "Where practical, the public tracts along the Big Horn River would be closed to livestock grazing unless grazing is used as a method of vegetative treatment." This paragraph should be removed because it gives no foundation for this action and restricts the multiple use of this public resource.

Page 38. And I quote, "BLM livestock grazing permittees and other interested parties would implement management actions including the use of grazing systems, land treatments, and range improvements." This paragraph should state the interested parties would participate in decisions on BLM lands within the allotment only. This paragraph should also state that the governments will actively pursue funding for actions taken to develop grazing systems, land treatments, and range improvements.

Page 38. Let me state that I feel that fencing wetlands causes as many problems as it was designed to eliminate. Wetlands are the most productive parts of a range. If fencing is done, then adequate access to water

must be maintained.

Page 38. And I quote, "When prescribed fire or mechanical treatments can be used effectively as techniques for managing vegetation, they would be preferred over chemical spraying." There is no supporting documentation for such a statement. This paragraph should be revised to read that chemical spraying, fire, and mechanical treatments are all effective techniques for managing vegetation, all methods should be considered for each application.

Pages 39. And I quote, "Grazing strategies would be designed to accommodate plant growth requirements of key vegetation species and their management objectives." Grazing strategies should not be designed solely by key vegetative species and their management objectives. The grazing needs and goals of the ranching enterprise should also be a factor. Key vegetative plants should be used as well as non-key plants. Historic uses and economic factors should play a role in determining what is now the key vegetation in each allotment.

Pages 39. Appendix 3 is mentioned as providing applicable information on utilization data. These tables overlook a very important point. Is utilization based on an average use of the allotment? If not, who will determine where utilization samples are taken?

Page 40 through 44. I strongly disagree with all

of the Preferred Alternatives found on page 40 through 41. I firmly believe that livestock and wildlife can and do exist on the same ranges. Due to past grazing practices, wildlife numbers have increased in all areas throughout the Grass Creek Resource Management Area. Rather than recognize this benefit which wildlife has received from the livestock industry, this document chose to penalize the livestock grazers by reducing their AUM utilization.

Page 42. Restrictions of use proposed by the BLM on vegetative treatment areas is no financially burdensome to livestock permittees that as a practical matter it eliminates this practice.

MR. DANIELS: Time is basically up.

MATT BROWN: Well, basically, I think that the document, in closing, should be thoroughly reviewed and that the comments spoken here tonight should be taken to heart. And I will submit the rest of my objections in this written document. Thank you.

MR. DANIELS: Thank you very much.

(Applause).

MR. DANIELS: I've been completely through the sign-up list. Is their anyone else here who has not gotten an opportunity to speak that would like to do so?

JAY MATHEWS: My name is Jay Mathews and my wife and I have a ranch out here on Gooseberry Creek, and we

have some significant private holdings in the Fifteen Mile watershed. I also hold grazing privileges and spend much of my time with my livestock in the North Gooseberry and South Gooseberry allotments. I point this out as a frame of reference so you will understand that unlike many of the comments you will receive, mine are based on real familiarity and understanding of what is actually going on out there in the field.

I have reviewed the RMP document and have several comments and serious questions that I would appreciate answers to. My observations relate exclusively to number one, ACEC designations; two, grazing, livestock management and range data; and three, economic assessment and data analysis.

Table 3-5 is admittedly in error, and my question is what conclusions and other analysis were based upon these erroneous data by BLM staff? Is there a domino effect here that prejudices other facets of this document? What credit or analysis has the significant amounts of non-use and range management improvements over the past 12 years made in this RMP document?

On Table 8, on page 126, indicates livestock grazing represents the least detrimental impact of all uses in terms of soil losses. Why is this activity then considered to be one of the focal points of the RMP and

specifically the proposed ACEC designation?

The 35 percent AUM proposed reductions are reportedly preference or paper AUMs and it is suggested that this will have no impact on ranching operations. If this is true, then where is the benefit to the rangeland to make these adjustments and for that matter, why do it at all? I suggest that there will be significant economic effects to ranch values, collateral and banking institutions, as well as to the individual ranch families. This is what custom and culture are really about.

Please explain what cannot be done in the Fifteen Mile watershed with ACEC designation. Historically, the BLM has spent millions of dollars doing watershed improvements in the Fifteen Mile watershed and to what avail? Have they stemmed the erosion and silt loads in the Big Horn River? I think not. By the way, how was all this accomplished without the benefit of its own ACEC designation? In reality this is a geologic phenomena occurring over geologic time and the BLM is trying to blame the rancher for the problem. I understand that the BLM intends to use this designation as a lever in Allotment Management Plan negotiations yet to be initiated against the grazers in the North Gooseberry allotment.

I submit that the ACEC designation is unnecessary and is simply yet another label overlapping three wilderness

study areas and a host of other use restrictions which will ultimately only high grade an admittedly otherwise sensitive geologic area. The additional use to be expected as a result of more designation will likely create even more impact from human use than currently exist from livestock. Where is the plan to implement this ACEC and what are the costs and impacts going to be identified? Let's show all the cards now before we get into another expensive boondoggle that accomplishes nothing. I also have a significant private holdings within the Fifteen Mile watershed and neither I or my neighbors have been consulted on this. It is simply someone's dream either come too soon or too late, but not now.

On pages 74 and 75, alternatives A and B propose no ACEC yet BLM indicates the same prescriptions as in the Preferred Alternative. Why designate it at all then? If Fifteen Mile watershed is really a sensitive riparian area, then why of all things are we proposing expansion of the wild horse area and numbers in the watershed?

In conclusion, I have been proposing to exchange my private lands in Fifteen Mile for years. It would seem logical and prudent to deal with this proposal before imposing your designations on me, or at least discuss this option in the land tenure adjustment portion of the EIS.

Please define what ORVs are in the context of your

proposal. It would be beneficial if the explanation were in plain English and not the bureaucratic jargon in the RMP.

Regarding the economic analysis, I find the numbers projected unbelievable. Billions of dollars to the planning area in the next nine years is pretty hard to swallow. Where are these impacts addressed? Thank you for the opportunity to comment.

(Applause).

MR. DANIELS: Are there any others that would like to speak tonight? If not, I thank all of you participants for coming out tonight and staying with us through all of this. It's been a long evening and the hearing is now adjourned.

(Off the record at 9:25 p.m.)

REPORTER'S CERTIFICATE

STATE OF WYOMING)
) ss:
COUNTY OF WASHAKIE)

I, Ranee L. Gonzales, a Registered Professional Reporter, do hereby certify that I was the Substitute Reporter, who at the time shown in the aforesaid transcript, took and transcribed the foregoing proceedings, and I certify the same to be true and correct.

IN TESTIMONY WHEREOF, I have hereunto set my hand at Worland, Wyoming, this 15th day of April, 1995.

RANEE L. GONZALES, RPR

BIG HORN COUNTY

SUPPLEMENT TO PUBLIC HEARING TESTIMONY BY RAY PETERSON

This packet contains

Big Horn County Commissioners Response

Big Horn County Land and Planning Concerns

Letter from Commissioner Charles Monk

BIG HORN COUNTY COMMISSIONERS

April 3, 1995

BLM
Attn. ___ Bob Ross Team Leader
PO Box 119
Worland Wy. 82401

Re. Grass Creek Resource Management Plan.

Big Horn County Commissioners submit the following concerns.
In the document,

1. Land ownership Adjustments. Page 31. Waste management, we hope the 1,220 acres will help in future expansion needs. Last year BLM policy cost Big Horn County over 100,000 dollars having to purchase private ground. There is no excuse for any Federal agency not to assist with local needs. We as a county don't have the choice of not having to deal with the waste and EPA it would be nice to have your assistance in these land matters next time around. The wording "would be considered" has us concerned

2. Page 33. "16,000 acres of privately owned land" Our county land use policy states "0% gain of federally managed lands in Big Horn County." We can't afford any more "Federal land."

3. Page 34. Rights of Way. "Adverse effects on scenic value. " This needs more justification. To sacrifice economics and lifestyles so the area will look good to the tourist driving through is not a good enough reason.

4. Page 35. "Mineral withdrawal" Where along the Big Horn River? We need specific locations.

5. Page 37. "Public land tracts along the Big Horn river would be closed.." Where? We need specific locations.

6. Proposed AUM reductions total nearly 60,000. This means nearly 5 million dollars in lost revenue and nearly 200 jobs. There are real figures that will directly effect the lifestyles of the people of the four county area. The promise of assumed, projected increase in tourism to replace this lost revenue does not convince Big Horn County residents. According to your figures, it would take 71,220,000 increase of total visitor days to replace just the grazing dollars lost. We haven't even talked about the loss of oil and mineral revenue yet. Also, This increase in tourism usage must be outside visitor use. Local use will not add any money to our local economies as the grazing and oil moneys do. To project a 32% increase in tourism is just a pie in the sky estimate made to offset the loss of real dollars of reduction of oil and grazing. Big Horn County history proves the point that tourism will never replace the ag economy that was lost in the Yellowtail area. Thirty years later, the tourism hasn't happened and we are still recovering from the loss of economy.

7. Page 46. "The sale of sand and gravel.." How far away from the river? What areas? We need a specific idea on this. Will this effect any current active selling areas?

8. Page 66. Wild Horse management. "The herd area would be increased by about 31,400 acres.." This will make two wild horse ranges in Big Horn County. Do we need two? Are these actually wild horses of the Spanish breed such as the Pryor Mountain kind? The reasons for enlarging the herd? Does the current number of horses require the additional area? We are opposed to enlarging the range based on a desire to enlarge the herd.

9. Page 67. "November through March sheep use.." What change over present controls would this mean?

10. Page 67. "Some cattle use would be allowed.." What is some? We need specific ideas on what this means to the individual cattle users in our county.

11. Page 68. "On the 31,400 acres added to the herd area.." What are the present AUM's now? What decrease would it be in this area?

12. Page 71. Wildlife habitat. "Along the Bighorn and Greybull rivers.." "As one measure" Are there more measures? Is firewood harvesting permitted in these areas now? How would this effect our Big Horn County residents?

13. Page 72. "Fences would be constructed.." Where? Again we need specific areas or an idea of proposed fencing. We need to know how this will effect our local ranchers, farmers, scenic, etc., in Big Horn County.

Concerns of Economic study done for BLM.

Recreation; If we are to compare tourism dollars to replace oil, gas minerals and grazing dollars lost then we must throw out all resident usage. These are not new incoming dollars. These dollars do not contribute to our valuation, schools and services as the oils and grazing dollars do. You're forecast for outside tourism increasing is overly exaggerated!

Agriculture, 1990 was a poor base year to use. The study should have taken a composite of a number of years in a five or ten year period. We need solid figures to judge by. The economical impact that these reductions will have will threaten our ranchers and farmer's industry as they will be forced to reduce their herd size, some will even be forced out of the business all together. This will not help our already decreasing valuation. In order for this plan to be complete it has to address each county individually to to the effects that each of these reductions and added controls will have on each county. Big Horn County is requesting these figures

Oil and Mineral, This area is very frightening to Counties that realize nearly 80% or more of the county valuation is based on this industry alone. Unless this plan addresses these concerns and reverses the current trend to decrease this industry on public lands, this plan will not stand or accepted by Big Horn County

These are a few of the areas we as Big Horn County commissioners are concerned with. With Federal agencies controlling over 80% of our county and the current trend to accommodate the environmentalists and tourists we are afraid that our way of life and very existence in this area is being threatened. When our input is considered on the same level as input from anyone else from anywhere else, it concerns us as we look to what control we have over our own lands and lives. Tourists will never pay the bills in Wyoming. Our economy is diversified and must remain so. To put unreasonable controls on the very industries that contribute to our lifestyles and economy for the purpose of making the drive to Yellowstone more scenic for the tourist driving through is nonsense. Your agency controls nearly 70% of our county. YOU must help us preserve our lands and our lifestyles without sacrificing the economy of the people you serve.
Until we see these suggested changes made to this plan and the report requested of how these proposed changes will effect Big Horn County alone, we stand against this document and suggest you file it right next to the Rangeland reform idea.

Sincerely,

R. Ray Peterson

R. Ray Peterson
Big Horn County Commissioner

EVALUATION OF GRASS CREEK RESOURCE AREA

DRAFT ENVIRONMENTAL IMPACT STATEMENT

20 MARCH 1995

PAGE 36	2nd paragraph	The current amounts, kinds, and seasons of livestock grazing use would continue to be authorized.....
Change		The 1994 amounts, kinds .....

MAP 20 Why is the area used for wild horse management going to be increased?

MAP 24 Is the BLM going to get public access to the shaded areas?

PAGE 179 SOCIOECONOMICS GENERAL How does all lands in planning area increase in impact to local area and BLM administered lands decrease? What is the BLM doing to cause this decrease?

PAGE 180 SOCIOECONOMICS LIVESTOCK GRAZING If things are going to remain the same (see page 36) how come we lose 3 million dollars. What is the cause of this projected decline in our area and BLM grazing in our area?

PAGE 181 SOCIOECONOMICS RECREATION What is going to increase the value of recreation on BLM land by 3 million and the local area by 13 million dollars? Is there a program out there? How many tourists does this equate to? Where are they coming from and where are they going to stay?

PAGE 183 WILD HORSES I don't see anything in the current management plan that indicates the need for 160,000 acres to expand this range. Since the preferred alternative reflects the current management I'm even more confused about expanding the range.

SUPPLEMENT TO PUBLIC HEARING TESTIMONY BY JAY MOODY

PARK COUNTY
Grass Creek Resource Area
Task Force Comments on Draft EIS

March 28, 1995

Table 2 -- Comparison of Alternatives

Air Quality Management:

GENERAL -- Information is needed on what dust control measures would be applied, and when and how it would affect new and existing uses.

SPECIFIC -- "Air quality standards are monitored by the Wyoming DEQ. (See the Affected Environment chapter for these standards.) Air quality permits would be obtained from DEQ before prescribed fires are set on public land. Smoke and pollution would be minimized as described in the Smoke Management Guidebook (BLM 1985)." Brush/limber pine encroachment should be allowed to be controlled by means of burning, and should not be limited by smoke/pollution restrictions. Fire must be left as a management tool.

"Dust control measures to reduce visibility impacts would be required for all construction and other surface-disturbing activities." Under what conditions would mitigation be necessary? This needs to be more clearly identified, and an evaluation of costs and benefits should be included.

Cultural, Paleontological, and Natural History Resources Management:

SPECIFIC -- "Historic resources in ten gas and oil fields would be managed for scientific and public use. The purpose would be to improve knowledge of the historic significance of the fields and facilitate the approval of future development and reclamation activities. The following fields would be included: Hamilton Dome, Grass Creek, Little Buffalo Basin, Walker Dome, Enos Creek, Golden Eagle, Gooseberry, Hidden Dome, Little Grass Creek, and Gebo." Does review of the historic aspects of fields restrict their use? Identification is not a problem if there is no associated restriction. There have been requests to the BLM for more information about what is important and the restrictions imposed, but there has been no response. Also, some of the historical resources have already been moved from some of these sites, and foundations are all that remain.

Fire Management:

GENERAL -- The plan is calling for good fire management, but this is not followed through. Instead of business as usual, there should be details including data on acreage, where fire will be prescribed for specific plant communities, fuel load, and a timetable for burning. There should be a public relations section with education as part of the goal. There should be some discussion to lead to understanding of the importance of fire management; fear should not be part of the plan. More acreage should be prescribed in the fire management section with an annual percentage target. Times and people are changing; it is better to manage through fire than to change the plan and cut allotments because of the political risks.

SPECIFIC -- "Full suppression (see Glossary) would be used on fires spreading to within 0.25 mile of state or private lands, property, gas and oil fields, important riparian habitat, or human life." Is 0.25 mile or any fixed distance adequate in ALL cases?

"Full suppression of wild fire would take place on the remaining public lands, comprising about 219,800 acres." Is full suppression to protect private lands? If so, the BLM should try to get pre-agreements with as many landowners as possible to allow fire as a management option. In that way, wild fire would be subject to only limited suppression.

"The Grass Creek Resource Area Fire Management Plan would be maintained and revised, as necessary, and implemented. The plan would address ecological areas for fire management based on fire ecology studies and would establish desired plant community and landscape goals that promote biological diversity. The plan would also address specific applications of prescribed fire to meet resource objectives." This plan is essential to good management of the land. The conditions for fire management need to be fleshed out and defined, and the effects identified as well as defining the burn cycle. An ecological plan for the resource area with details and concepts of

fire management should be set up as poor management leads to erosion, etc. Is the present plan really based on a 1600 year burn cycle? Is the public limiting good management so a ten to a fifty-year cycle cannot be promoted? These issues need to be addressed.

"When prescribed fire or mechanical treatments can be used effectively as techniques for managing vegetation, they would be preferred over chemical spraying." This statement is supported and should be retained and expanded upon.

Forestland Management:

SPECIFIC -- "MANAGEMENT OBJECTIVE. Maintain and enhance the health, productivity, and biological diversity of forest and woodland ecosystems. A balance of natural resource benefits and uses would be provided to present and future generations. The management of forest and woodland resources would be consistent with ecosystem management principles." "Ecosystem management principles" need to be defined. Clearcut objectives need to be defined better as well as the visual breakup in clearcut areas. Alternative "B" is too vague.

ALTERNATIVE "C" -- "Road construction for harvesting timber or for conducting forest management practices would be prohibited on slopes greater than 25 percent." Is there a conflict between this action and the Forest Service?

"Severely mistletoe-infested stands would be clearcut while stagnated, and overstocked pole timber stands would be thinned, if there is a chance that they would respond with further growth and produce wildlife thermal cover." Is the first part of this statement referring to wind stagnated? This needs to be clarified.

"Overstocked seedling, sapling, and pole stands would be precommercially thinned on up to 800 acres to increase timber production and improve long-term wildlife thermal cover." Why is there an acreage limitation included here? This is in conflict with the objective

"All harvest areas would be regenerated by natural or artificial means. If at the end of fifteen years any clearcut area fails to regenerate naturally, planting and other methods would be used to assure regeneration unless converting vegetation to another type is the objective." There is a need to define and specify what is being done with aspens.

"In seasonal wildlife habitat areas, clearcuts generally would not exceed 300 yards (approximately 15 acres) in any direction. Wildlife escape cover would be maintained by keeping a corridor of timber around, or on one or more side of, roads, clearcuts, parks, wetlands, and wallows. Trees and snags would not be cut if they provide important habitat for cavity or snag-nesting wildlife." Why is this limited to no more than 15 acres? Besides, there appears to be two separate limits here, 300 yards in any direction and 15 acres

"Harvesting firewood along desert waterways and the Bighorn and Greybull Rivers would be prohibited." Aren't there some cases where this would be appropriate as a better management option to allow for the removal of standing trees in these areas?

"Prescribed fire would be used to improve aspen stands, regenerate old age forest stands, manage for desired successional stages and forest species composition, and rehabilitate harvest areas." Table 19 does not promote regeneration and conversion of old age forests. The mature and over mature stand is excessive, and does not support this objective. Numbers should be included to show acreage to be treated, and how this is related to elk and deer habitat objectives.

Lands and Realty Management:

Access:

GENERAL -- A priority should be to identify private lands affected by access to public lands. These areas need to be clearly defined as to where public access occurs or is to occur for planning purposes.

SPECIFIC -- "Emphasis would be placed on acquisition of access to public lands on the Bighorn and Greybull Rivers to enhance recreational opportunities and wildlife management." The access sites should be carefully planned and well defined. The public needs to be educated on the importance and value of access.

"BLM would pursue a combination of motorized and nonmotorized vehicle access in the Enos Creek, upper Cottonwood Creek, and upper South Fork of Owl Creek areas of the Absaroka Mountain foothills. Goals would be to provide vehicle access to the South Fork of Owl Creek to improve fishing and other recreational opportunities and to acquire foot and horseback access to the Shoshone National Forest. All access would be limited

seasonally and to specific routes as appropriate." The target areas for access routes need to be identified more specifically.

"Access to specific areas may be closed or restricted to protect public health and safety, and significant or fragile resources." When, where, and under what conditions this would apply needs to be specified.

Landownership Adjustments:

SPECIFIC -- "Agricultural trespass on public land would generally be resolved by prohibiting the unauthorized use; however, land sales or leases could resolve agricultural trespass in some cases. Leases might be used to develop the lands as wildlife food and cover areas. Agricultural trespass is estimated to occur on about 400 acres." BLM land in agricultural trespass should be evaluated to determine the historical uses of that land, and if the land has been historically used for agriculture, it should be protected (an alternative should be provided to continue the use). Furthermore, the lands in question should be identified specifically.

"Applications for desert land entry on public lands would not be considered. Public lands having agricultural potential and water would be considered for disposal only by sale or exchange." The first statement would be changing the law through the plan, and should be withdrawn. The second statement is unclear as to what is meant.

"Approximately 33,700 acres of public lands that are difficult or uneconomic to manage (Map 6) would have priority consideration for public sale, Recreation and Public Purposes Act lease or patent, exchange, or transfer of jurisdiction to another agency. Other proposals for these types of actions on any other public lands in the planning areas would also be considered on a case-by-case basis." How are lands to be dispersed? A community plan is needed. What will be done about access issues?

"Cooperative agreements or land exchanges to improve wild horse management would be pursued on about 16,000 acres of privately-owned land." Why is there such a focus on private land?

Rights of Way:

SPECIFIC -- "Most of the planning area would be open for rights-of-way development. Proposals would be addressed on an individual basis with emphasis on avoiding certain conflict or sensitive areas." What exactly is meant by "most" of the planning area?

Withdrawals:

"All coal and phosphate classifications (Map 9) would be terminated and the lands would be returned to operation of the General Mining Laws." How would this affect local government? How can the government change the law within an EIS or Management Plan?

Livestock Grazing Management:

GENERAL -- This section should have at least three viable alternatives -- much of this section is the same throughout ("Same as Preferred."). One possible alternative provided by the Meeteetse Conservation District is "Coordinated Resource Management" (CRM), which was not considered in the draft. The point was raised that CRM is management intensive, largely untested, and has received some negative reports (although minimal) in *Rangelands*. It was countered that CRM has worked well overall, and the BLM has used it in other areas.

It was requested that a copy of the Conservation District's *Land Use Plan* be included with the county's comments. Holistic Resource Management should at least be included as an alternative on an experimental basis -- most would like it as a viable alternative.

There was a concern with the cut in the AUMs. Every effort should be made to keep ranching viable, therefore, holistic resource management needs to be looked at. It can be applied to other areas as well, such as timbering. It was pointed out that elk follow areas of livestock grazing so that livestock is beneficial to wildlife habitat.

There are no comments in the document that this area is in a serious deterioration mode. If it is not in deterioration, where is the justification for cutting livestock grazing? There seems to be a hidden agenda to decrease livestock grazing. The economic impact of doing so has not been fully considered.

The preferred alternative seems to be geared to increasing wildlife without serious discussion with the Game and Fish Department. There is concern that the area will not maintain the objective of the wildlife numbers set forth. Projections should be included for all game, and wildlife and livestock AUMs should be allocated accordingly. Overall, reductions should be done on a percentage basis, instead of livestock being cut for wildlife

GENERAL -- Some restrictions should be removed as mentioned in comments on Table 3

Off-Road Vehicle Management:

GENERAL -- There is nothing that deals with signing or enforcement. Areas for off-road vehicle use need a clearer designation. Are there any allowances for handicapped access?

SPECIFIC -- "Public lands near Sheep Mountain, Red Butte, Bobcat Draw Badlands, and the upper part of the South Fork of Owl Creek (about 52,460 acres) would be managed as closed to ORV use until activity planning specifically addresses vehicle use in these areas." How much time is needed for activity planning? Should the area be closed the entire planning time? It seems to be a large area.

"Over-the-snow vehicles would be subject to the same requirements and limitations as all other vehicles until activity planning specifically addresses their use." Ranchers sometimes rely on snowmobile travel. The protection of crucial winter range should be specifically addressed. Game and Fish needs to have specific studies to determine if a problem exists.

Recreation Management:

SPECIFIC -- "Portions of the town of Gebo and adjacent coal mining areas on public land would be managed for preservation and interpretation of cultural and historic values. Management could include actions like development of an interpretive road loop or roadside turnout." This should be adjusted so as not to cause any restrictions on the existing Gebo Field.

"A scenic interpretive road loop would be developed in the Badlands area. This could include the Fifteenmile Creek, Dorsey Creek, and other roads, and an overlook at Painted Canyon." A cost-benefit analysis should be done before taking action on Fifteenmile Creek as there is forty to fifty miles of road along the stream bed. This section creates a possible conflict with the Off-Road Vehicle Management goals in that it would tend to increase off-road use. There should be a map included showing the proposed roads. It was suggested that the Fifteenmile Creek proposal should be eliminated as counter-productive. However, it was also stated that if more details were provided, there might be an overall economic benefit of recreation dollars.

"Development of a campground would be pursued near Wyoming 120 and Gooseberry Creek." Here again, more details are needed. The specifics on how large of a campground would be pursued, and its effects on the surrounding area should be included.

"Trailheads, day use areas, and other recreational sites would be avoidance areas for surface-disturbing activities, although development of recreational facilities would not be avoided." This statement puts one resource ahead of others without supporting information.

Vegetation Management:

GENERAL -- There is no DPC for livestock, but it was pointed out that this would fall into the grazing section. Ecosystem management objectives do not include domestic and non-native species, and can't exclude existing uses. It has been shown that if a plan concentrates on one species, the overall productivity of the area decreases. However, there was some concern that this draft is managing for wildlife specifically.

Wild turkeys are not mentioned. There is a question if they exist in the area, and if so, if they should be mentioned in this and/or other sections.

Candidate and T&E Plants:

SPECIFIC -- "The BLM would participate with the Nature Conservancy, U.S. Department of the Interior Fish and Wildlife Service (FWS), and other agencies in the evaluation of areas for the potential transplant of protected plant species on BLM-administered lands." This should be more specific. For instance, a species list of plants would be nice. The other agencies should include the Forest Service Research Lab (mentioned by name). The nature Conservancy shouldn't be singled out as the only private entity.

Noxious Weeds:

SPECIFIC -- "Control of noxious weeds, may include manual, mechanical, biological, or chemical methods. If herbicides are proposed for use, those with minimum toxicity to wildlife and fish would be selected. As appropriate, buffer zones would be provided along streams, rivers, lakes and riparian areas, including riparian areas along ephemeral and intermittent streams." Grazing should be listed as one of the control methods.

GENERAL -- Some restrictions should be removed as mentioned in comments on Table 3

Off-Road Vehicle Management:

GENERAL -- There is nothing that deals with signing or enforcement. Areas for off-road vehicle use need a clearer designation. Are there any allowances for handicapped access?

SPECIFIC -- "Public lands near Sheep Mountain, Red Butte, Bobcat Draw Badlands, and the upper part of the South Fork of Owl Creek (about 52,460 acres) would be managed as closed to ORV use until activity planning specifically addresses vehicle use in these areas." How much time is needed for activity planning? Should the area be closed the entire planning time? It seems to be a large area.

"Over-the-snow vehicles would be subject to the same requirements and limitations as all other vehicles until activity planning specifically addresses their use." Ranchers sometimes rely on snowmobile travel. The protection of crucial winter range should be specifically addressed. Game and Fish needs to have specific studies to determine if a problem exists.

Recreation Management:

SPECIFIC -- "Portions of the town of Gebo and adjacent coal mining areas on public land would be managed for preservation and interpretation of cultural and historic values. Management could include actions like development of an interpretive road loop or roadside turnout." This should be adjusted so as not to cause any restrictions on the existing Gebo Field.

"A scenic interpretive road loop would be developed in the Badlands area. This could include the Fifteenmile Creek, Dorsey Creek, and other roads, and an overlook at Painted Canyon." A cost-benefit analysis should be done before taking action on Fifteenmile Creek as there is forty to fifty miles of road along the stream bed. This section creates a possible conflict with the Off-Road Vehicle Management goals in that it would tend to increase off-road use. There should be a map included showing the proposed roads. It was suggested that the Fifteenmile Creek proposal should be eliminated as counter-productive. However, it was also stated that if more details were provided, there might be an overall economic benefit of recreation dollars.

"Development of a campground would be pursued near Wyoming 120 and Gooseberry Creek." Here again, more details are needed. The specifics on how large of a campground would be pursued, and its effects on the surrounding area should be included.

"Trailheads, day use areas, and other recreational sites would be avoidance areas for surface-disturbing activities, although development of recreational facilities would not be avoided." This statement puts one resource ahead of others without supporting information.

Vegetation Management:

GENERAL -- There is no DPC for livestock, but it was pointed out that this would fall into the grazing section. Ecosystem management objectives do not include domestic and non-native species, and can't exclude existing uses. It has been shown that if a plan concentrates on one species, the overall productivity of the area decreases. However, there was some concern that this draft is managing for wildlife specifically.

Wild turkeys are not mentioned. There is a question if they exist in the area, and if so, if they should be mentioned in this and/or other sections.

Candidate and T&E Plants:

SPECIFIC -- "The BLM would participate with the Nature Conservancy-U.S. Department of the Interior Fish and Wildlife Service (FWS), and other agencies in the evaluation of areas for the potential transplant of protected plant species on BLM-administered lands." This should be more specific. For instance, a species list of plants would be nice. The other agencies should include the Forest Service Research Lab (mentioned by name). The nature Conservancy shouldn't be singled out as the only private entity.

Noxious Weeds:

SPECIFIC -- "Control of noxious weeds, may include manual, mechanical, biological, or chemical methods. If herbicides are proposed for use, those with minimum toxicity to wildlife and fish would be selected. As appropriate, buffer zones would be provided along streams, rivers, lakes and riparian areas, including riparian areas along ephemeral and intermittent streams." Grazing should be listed as one of the control methods.

Desired Plant Community (DPC) Objectives -- Standard Objective:

GENERAL -- The format used for the plant communities is insufficient. Key species should be identified in each group, and further broken down by the species. Furthermore, it should be demonstrated that a desired plant community can exist in the area. Otherwise, management is focused on something that can't be done

With wildlife, there is a question on how crucial winter habitat is determined. Is crucial habitat based on sightings, observations of plant species, protection from the worst weather, or what? This should be made clear. Also, the wildlife part of this section should be figured to an AUM basis.

DPC Objectives for Forestlands:

SPECIFIC -- "Desired Plant Community Objective: Manage 80% of forestlands for hiding and thermal cover (50% of these stands would have thermal cover characteristics). Ten percent of the forestlands would be managed for old growth." A definition is needed for "hiding and thermal cover". Also, there is a problem with the definition of "old growth". How much mature and over mature growth is there in the old growth areas now? Once, the proper definition of old growth is determined, it needs to be figured what percentage of old growth currently exists, and what is desired.

DPC Objectives for Moose Winter Range:

GENERAL -- The moose habitat is not defined very clearly. It seems to be restricted to stream bottoms in the winter time, and neglects the fact that vegetation on the slopes of the mountainsides is very important also.

DPC Objectives for Moose Calving Habitat:

SPECIFIC -- "Desired Plant Community Objective: Mixed Conifer/Deciduous Communities. Increase acreage of aspen stands where feasible. Riparian Communities: Maximize shrub and deciduous tree protection." Also, there is a need to take into account the non-riparian areas, such as the mountain slopes mentioned above.

DPC Objectives for Mule Deer Winter Range:

GENERAL -- The crucial winter range for mule deer needs to be better defined. Map 34 seems to indicate there is a great deal of crucial winter habitat. Is all of this actually used by mule deer, or is it just based on conditions.

DPC Objectives for Pronghorn Antelope Winter Range:

GENERAL -- The crucial winter habitat is mainly on the east side of the highway. The highway fencing has cut into their migration routes.

DPC Objectives for Sage Grouse Nesting Habitat:

GENERAL -- A lot of available information was not used in this section. The species is on trouble because of a lack of decadent sage brush adjacent to strip meadows. The chicks need this type of habitat to provide protection and for the insects to eat. Again, it appears as if the lack of fire as a management tool has led to the poor conditions and reduced the ideal habitat.

Visual Resource Management:

SPECIFIC -- "Facilities or structures such as power lines, oil wells, and storage tanks would be screened, painted, and otherwise designed to blend with the surrounding landscape." This is not objectionable as long as the cost is within reason. Screening for example, can be very costly without much benefit.

"Facilities or structures proposed in or near wilderness study areas would be designed so as not to impair wilderness suitability." What is meant by "near"? This needs to be specific. Also, it is not really clear what is meant by this entire statement.

ALTERNATIVE "A" -- "To protect scenic values along major travel routes to Yellowstone Park, the placement of utility rights-of-way would be avoided along Wyoming highways 120 and 431." Does this mean that existing rights-of-way would be eliminated. It is generally felt that the utility rights-of-way are best suited along the highways.

Watershed Management:

GENERAL -- The benefits of water discharge from the oil fields needs to be addressed, since this water meets the criteria set forth. Also, most water in the resource area is fresh water, not saline as implied in the document.

SPECIFIC -- "MANAGEMENT OBJECTIVES: Maintain or improve water quality to support state of

Wyoming designated uses, and comply with state water quality standards. Reduce erosion by increasing ground cover, including vegetative litter, and maintain standing vegetation after grazing." How much standing vegetation? Litter is standing vegetation on the ground. This section should be broken down by plant species and goals should be set by watershed.

"By the end of calendar year 2005, increase properly functioning riparian areas from 50 percent of the total public land stream miles (in 1990) to 75 percent or more of these stream miles." How is this proposed to be accomplished?

"Reverse declining trend and stabilize or improve upland vegetation on about 15,000 acres to protect watershed and other resource values." What 15,000 acres is being referred to? What are the other resource values?

"Improve watershed condition elsewhere in the planning area, especially on uplands in poor or fair ecological condition." This is not specific enough.

"To obtain valid water rights, the BLM would file for the rights to water-related projects on public lands with the Wyoming State Engineer's office." Co-filing should be encouraged between the BLM and the permittee or possibly the Game and Fish.

"To protect watershed values, roads and trails would be closed and reclaimed if they are heavily eroded or washed out, or if access roads in better condition are available." Diversions could be used to minimize erosion/washouts. Roads can be graded to minimize the problem with the added benefit of providing water from runoff for wildlife. Sanctions should be written into the plan, and fines levied for misuse to protect the area.

"To protect watershed values, driving would be prohibited on wet soils and on slopes greater than 25 percent, if unnecessary damage to vegetation, soils, or water quality would result." How will this be done? The rules need to be clearly posted, and sanctions and fines imposed to carry the rules out.

"To reduce the amount of nonpoint pollution entering waterways, pollution prevention plans would be developed for actions that qualify under the Wyoming Storm Water Discharge Program." The BLM would be solely responsible for this. They should cooperate with the Conservation Districts to protect soil and water.

"About 400 acres would be planted with native grasses to improve the condition of the Fifteenmile Creek Watershed. Livestock grazing would be deferred in these areas until the desired vegetation is established." Livestock grazing would be deferred, but what about wildlife and wild horse grazing? What is to be accomplished by this? This section needs to have the specifications and goals more clearly identified.

Wild Horse Management:

GENERAL -- The group would like to see the money being spent on the wild horse herd being instead used for range improvement (watershed, wildlife, and grazing), and concentrate the wild horses in the McCullough Peaks Area. Overall, the wild horse herd should be eliminated in this area. At a minimum, Alternative "B" should be followed. The detrimental effects of having wild horses include that they compete with the wildlife and bring traffic into the area. It is felt that the program is not cost effective, and the money could be better spent elsewhere. In addition, the 2300 AUMs could be allotted to other wildlife.

Wildlife and Fish Habitat Management:

GENERAL -- The wetlands map is questionable as it seems to be inaccurate. What method was used to determine wetlands? If part of an area is a wetland, that should not mean that the entire area is included.

SPECIFIC -- "Annual review and environmental analysis of insect infestations would be conducted with APHIS and control measures would be performed as needed." This needs to be done at a time when it would not impact the sage grouse.

Wildlife Habitat:

SPECIFIC -- "BLM would participate with the FWS in the evaluation and designation of critical habitat for threatened or endangered species on BLM-administered land. If proposed surface-disturbing or disruptive activities could affect these species, BLM would consult with the FWS as required by the Endangered Species Act." This should have a stipulation that the area in question is actually being used by the species. There was a suggestion that there should be an opportunity for public participation/comment. However, it was also suggested that public comment should be limited to those with some expertise in the matter.

"The BLM would continue to work with the USDA Forest Service (FS), FWS, WGFD, and the Wind River

Indian Reservation tribes in developing a healthy bighorn sheep herd in the Absaroka and Owl Creek Mountains." What is considered "healthy"? It was pointed out that H-class diversity is never spoken of in this document when talking about the health of different species.

"Nest sites, roosts, cottonwood trees, and other potential critical habitats related to hunting and concentration areas for bald eagles would be protected, especially along the Bighorn and Greybull Rivers. As one measure to protect these habitats, firewood harvesting would be prohibited in these areas." This statement should clarify that it applies to BLM land only. This action could have the negative effect of closing off riparian area access, thereby cutting off hunting. On the other hand, the bald eagle is still a threatened species and steps need to be taken to protect it. The definitions for protected area and range from the FWS could be incorporated.

"BLM would participate with the FWS and WGFD in the evaluation of habitat areas for the potential transplant of protected fish and wildlife species on public lands." It was suggested that this should be modified to allow for public involvement or should follow the NEPA process. It was countered that any action would require an EIS or EA which would provide opportunity for public comment.

"Fences on public land that are hindering natural movement of wildlife would be modified. Fence modifications would conform to standards outlined in BLM Manual Sections 1741 and 9170. Priority would be given to fences that are restricting the greater numbers of wildlife in, or near, calving and fawning areas or crucial winter areas. Affected parties would be consulted before fence modification to ensure a mutual understanding of the need for the change and for establishing acceptable fence standards." This is acceptable only if the BLM is responsible for paying for the fence modifications.

"Emphasis would be placed on acquisition of access to public lands on the Bighorn and Greybull Rivers to enhance recreational opportunities and wildlife management." Has there ever been a problem with access for wildlife management? Enhancing recreational opportunities may pose a conflict with the bald eagle objective.

"BLM would encourage the construction of islands in reservoirs, encourage the growth of riparian vegetation by plantings and/or grazing management, and install nesting structures to manage for waterfowl production and security areas near reservoirs." This is acceptable only if a reliable source of off-site water is made available when fencing off reservoirs

Fish Habitat:

SPECIFIC -- "Reservoirs and riparian areas would be maintained to improve or enhance potential fisheries. The BLM would encourage the design of reservoirs to enhance fisheries where potential exists." What does enhancing potential fisheries involve? This doesn't seem to improve the ecology of the area. New species should not be introduced into the area.

Special Management Areas:

Fifteenmile Creek Watershed:

SPECIFIC -- "An area of Critical Environmental Concern (ACEC) would be designated in the Fifteenmile Creek Watershed on about 274,300 acres of public land. (See Map 21). The special management designation would not apply to state or private lands." Creating a ACEC in this area would be a grave mistake, and should not be done without adequate justification defined in this document. Concentration should be on fixing the existing problems in the area instead of declaring it an ACEC. The sediment load entering the Bighorn River should be evaluated to determine how much is geological erosion. Management practices could be used to stabilize other factors contributing to the sediment load.

Upper Owl Creek Area:

SPECIFIC -- "Management would include limiting or prohibiting surface-disturbing activities and closing the area to the staking and development of mining claims to protect fragile soils, alpine tundra, important wildlife habitat, and scenic values. (Also see TABLE 3 -- CONSTRAINTS ON SURFACE-DISTURBING ACTIVITIES.)" There is a strong objection to "no surface occupancy" in the Upper Owl Creek Area. This prohibition does not allow for mitigation through the use of new technology, etc.

Table 3 -- Constraints on Surface-Disturbing Activities

Miscellaneous Resources:

SPECIFIC -- "Based on site-specific environmental analyses, surface disturbing activities would be limited during wet weather periods, on frozen soils, and on slopes greater than 25%; visual impacts would be mitigated in scenic areas (visual resource management [VRM] class I and II areas); surface-disturbing activities would be prohibited within 500 feet of surface water and (or) riparian areas; and surface-disturbing activities would be avoided in the immediate vicinity of significant cultural and paleontological resource sites, and within 0.25 mile or within view (whichever is closer) of rock art and significant segments of historic trails." Work is often required to be done on frozen soil in places such as Alaska, and "steep" slopes should be increased to at least 30%. A definition of "immediate vicinity" is needed.

Cultural Resources:

SPECIFIC -- "Sand and gravel mining would be prohibited within 0.5 mile of the Legend Rock Petroglyph Site. (This would correspond to a No Surface Occupancy stipulation for gas and oil leasing.)" Is a half mile really necessary, or is even more needed?

Wildlife Resources:

GENERAL -- Using Alternative B with its timing restrictions in conjunction with the terms and conditions contained in the standard lease, the wildlife resources would be sufficiently protected. Shutting down is an asinine restriction; other methods would work.

SPECIFIC -- "Unless site specific environmental analyses demonstrate that adverse effects can be mitigated or avoided, surface-disturbing or disruptive activities would be prohibited during certain periods of the year on specific big game crucial winter ranges and birthing areas, in suitable breeding and nesting habitat areas within two miles of the center of sage grouse leks, and within 0.5 mile of raptor nests or within view of nests, whichever is closer. (This would correspond to a Timing Limitation stipulation for gas and oil leasing.)" Two mile boundary around sage grouse leks is too restrictive. The real problem with the baby chicks, a deficiency of appropriate habitat as a result of a lack of controlled burning, is not addressed in the document. They largely ignore human activity.

"In sage grouse complex areas, surface-disturbing activities would be allowed within 0.25 mile of the center of individual leks subject to resource condition objectives described in the next row. (Sage grouse complex areas, including lek centers and adjacent habitat, are described in Chapter 3.)" This restriction would be better if it was increased to 0.5 mile. This change would not be unreasonable since it would only apply about 3-4 weeks a year.

Wildlife, Soil and Water, Vegetation, and Scenic Resources:

SPECIFIC -- "Surface-disturbing activities would be prohibited in the Absaroka Mountain foothills in the vicinity of Castle Rocks and Mudstone Ridge; and within 0.25 mile of the South Fork of Owl Creek on about 8900 acres. (This would correspond to a No Surface Occupancy stipulation for gas and oil leasing.)" There was an objection to the "No Surface Occupancy" part of this statement, but it was argued that 0.25 mile is not that bad.

Map 9 -- Existing Mineral Classifications:

Why is the large area in T.45N., R.96W. included in the coal or phosphate classification?

Map 10 -- Mineral Withdrawals (Preferred Alternative):

Why is the large area just to the north of Thermopolis withdrawn?

Table 8 -- Activities Affecting Soils and Estimated Acres and Durations of Disturbance:

The soil loss is calculated according to a computer model, and does not take into account compaction of the soil or any improvements done that would reduce erosion. In addition, there is no component for wildlife included in the table.

Table 15 -- Assumptions for Analysis by Alternative:

Fire Management:

SPECIFIC -- "About 600 acres of public land would be burned by wildfire during the analysis period." Six hundred acres is very insufficient. The resource area should be set up on a target of a 40-50 year cycle.

Forestland Management:

GENERAL -- All four alternatives are inadequate for managing a timber stand that is 86% mature.

SPECIFIC -- "Timber harvests and other forest treatments would affect between 1500 and 1900 acres of public land." This program is inadequate to deal with the resource inventoried. Alternative "B", with the highest acreage range, would still be inadequate.

Lands and Realty Management:

Access:

GENERAL -- The focus should be on not losing any access.

SPECIFIC -- "Public easements of up to 20 miles would be obtained on about 10 to 20 roads during the analysis period." The ten to twenty roads should be identified.

Livestock Grazing Management:

GENERAL -- 1990 was not a typical year, and should not be used as a base year for analysis. An average over a range of years would be much better. For the AUM baseline, an average over all years with records available should be used.

It has not been proven that a decrease in AUMs is necessary in the future, since the data that was used is invalid. It would be nice to see a program with definitive encouragement for those doing a good job, and sanctions for those who are not. For example, reclaimed AUMs should be returned to good permittees.

SPECIFIC -- "Range projects and treatments would usually be developed or applied in "I" category allotments. It is anticipated that project development would include construction of 50 miles of fence, 20 reservoirs, 10 springs, 10 miles of pipelines and 10 wells during the analysis period." This penalizes people who have done a good job (those in "M" category), because they can't improve

Minerals Management:

Gas and Oil:

GENERAL -- Revenues from oil and gas make up $273 million out of a total of $300 million. Given this fact, the economic importance of this activity is downplayed in the document and its overall importance is not stressed enough. It was brought forth that the overall economic importance of coal and grazing are downplayed also.

SPECIFIC -- "The recoverable reserves of the new fields would be about 500,000 barrels of oil or 5 billion cubic feet of gas, during the life of the fields, which could range from 50 to 75 years." Since the potential is unknown, the reserves should be listed in a range, i.e., 500,000 to 10 million barrels. There is no reason for indicating such a small potential, and the potential should not be labeled "very limited"

B lists

KEY POINTS TO CONSIDER
FOR PROPOSED OIL & GAS MANAGEMENT
IN THE GRASS CREEK RMP DRAFT EIS

- For all four alternatives, the changes in the proposed restrictions would have a resultant change in the exploration and development potential for the oil & gas industry. In fact, the current management in Alternative A is sufficiently restrictive that exploration plays are discouraged. Alternative B addresses minimal restrictions that can be handled on a case by case basis using [redacted]. Our industry recommends adopting Alternative B and thinks that any environmental concerns can still be minimized. Our industry would prefer to work with the BLM to develop a new alternative.

- Since the oil & gas industry believes that each alternative will result in a resulting change in industry development, the production forecast in the draft EIS is also incorrect. Also, by the negative perspective taken on page 293 concerning Future Potential, the BLM has excluded all upside scenarios [redacted]; new technology proving reduced drilling costs; and significant increases in exploratory activity due to higher hydrocarbon prices. Industry will be providing estimates of production for the four alternatives to be considered. The socioeconomics in the EIS should also be changed to reflect the changes in production. [redacted] socioeconomic s[redacted] should also include government revenues generated [redacted] the various c[redacted] users of the public lands. State & local government officials need that data in order to make recommendations on the EIS. The BLM should seriously consider that our industry contributed $273 million of the over $300 million in revenues to tha economy from the Grass Creek RA and the proposed restrictions will result in reducing those revenues.

- In general, the proposed restrictions of No Surface [redacted]) and [redacted]) for the Preferred Alternative place detrimental restrictions on the higher interest areas of [redacted]. While the Northeastern half of the Grass Creek Resource Area (RA) has mostly moderate and high oil & gas potential, it is an area that will require high dollar investment for the deep gas play and will not probably occur for a few years. The Southwestern half of the Grass Creek RA, on the other hand, contains the more shallow, less expensive, plays (probably oil) and, in turn, would have a higher interest and potential for development at this time. The preferred alternative's restrictions of NSO, CSU, and TL discourage utilizing the new technology of 3D seismic exploration and drilling of any potential plays.

The proposed restrictions cover [redacted] of high potential oil & gas, 44% of the moderate potential, and 93% of the low potential. The total area for the restrictions cover about [redacted] acreage. As mentioned, these restrictions discourage development.

SUPPLEMENT TO PUBLIC HEARING TESTIMONY BY CHARLES JOHNSTONE

- The NSO, CSU, and TL restrictions all result, mainly, from a perceived oil & gas impact on wildlife, whether big game or sage grouse. In our opinion, i[redacted] our industry on wildlife is not sufficiently justified in the draft EIS. Our industry believes that there are other sources that negatively impact wildlife more so than the oil & gas industry activities. In fact, recent articles in the monthly publications of Ducks Unlimited and The North American Pronghorn Foundation are two sources of studies of the effect of predators on wildlife. There also have been reports of the effects of drought on wildlife. The BLM needs to include studies of these impacts also.

- The proposed NSO restriction on the Upper Owl Creek area (17,100 acres) is an area about 10 miles by 2.5 miles. This restriction implies that the area can be developed by directional drilling; however, the restriction pushes the technology unreasonably. For the depth of the potential plays, a horizontal distance of 1/4 to 1/2 mile would be a reasonable limit for a well. The proposed NSO restrictjon would exclude most of the area from development.

  A more reasonabla proposal for this area would be to allow corridors of access and propose reasonable cluster (some directional drilling) development. For an area that is all moderate potential, the Upper Owl Creek area would [redacted] not be leased for exploration under the BLM's proposal of NSO.

- The proposed CSU restriction on the Owl Creek foothills (61,100 acres) requires maintenance and operations on newly discovered fields to be shut in for 6 to 8 months of the year for wildlife considerations. This restriction is unreasonable, again because of lack of justification that was previously mentioned, and does not consider the possible use of automation technology to allow year round production with minimal human impact. This area is mostly moderate potential and, as with the previous NSO restriction, it [redacted] leased.

  The remaining proposed CSU restriction on sage grouse habitat and strutting areas implies impact by our industry without justification. Unless justification is provided, we recommend that this restriction be dropped.

- Cultural or archeological surveys are required by the National Historical Preservation Act; however, most of any archeological finds (page 153) are the result of oil & gas activity and most disturbances are not of significant value. The regulations and the proposals in this draft EIS should be changed to minimize the extensive surveys required on our industry.

- It is recommended in the draft EIS that at least ten oil & gas fields be surveyed for determination of the historical significance of the fields. Our industry does not have a problem with the surveys, if the BLM includes in the final EIS stipulations that no restrictions on operations will be imposed as a result of the surveys. We prefer that the fields be considered living history and not preserved history.

3

- Since oil was discovered in 1884, six years before Wyoming was a state, we think that the oil & gas industry are part of the heritage of this state. For thet reason, visual restrictions as proposed in the draft EIS should be dropped. The BLM should encourage the visual enhancement of our operations with descriptive signs rather than visual restrictions.

- Page 195 - At the bottom of the first column and the top of the second column, the sentence implies that produced water <u>may</u> lower the water quality. For the most part, produced water discharged in the Grass Creek RA is of a quality that it is used for wildlife, stock watering, irrigation, etc. This section should be changed to document the benefits of the produced water for the Grass Creek RA, not imply that it is detrimental.

- Page 126 & 127 - We believe the soil loss information for our industry's work is excessiva. Our understanding is that the data was developed from a computer model. We would recommend that the model be modified to include artificial cover such as vegetation and gravel if that information has not been included.

- Page 201 - The U.S. Fish & Wildlife Service's EIS for the reintroduction of the grey wolf specifically stated that once the wolf in Yellowstone Park left the Park, the species was experimental and would <u>not</u> be protected. The paragraph on paga 201 in the Grass Creek draft EIS implies protection and should be changed.

4

FOR THE PREFERRED ALTERNATIVE

tury gas end oil production, and coal mining itself. During severe winters surface coal mining would not bc allowed it mule deer are on cruciel winter ranges near the mine. These protective measures would not significantly interfere with coal development.

Gas end Oil

"No surface occupancy" (NSO) constraints on naw gas and oil leasing would apply to about 2,130 acres of BLM-administered mineral estate having high potential for gas and oil occurrence, 15,790 ecres with moderate potential, and 2,280 ecres with low potential.

Most of these lands (17,100 acres) would be in the proposed Upper Owl Creek ACEC, on Tertiary age volcanic rocks of the Absaroke Mountain foothills. Sinca 1965, six exploratory wells have been drilled in or adjacent to the proposed ACEC. All were dry holes. Immediately south of the proposed ACEC, the potential for gas and oil occurrence is low, because Mesozoic age reservoir rocks are absent, end exposed Paleozoic ege rocks have lost their gas and oil through erosion.

Future exploration in the Abearoka Mountain foothills would continue northeast of the proposed ACEC, where four gas and oil fielos heve been discovered.

"Controlled surface use" (CSU) constraints on new ges and oil leasing would epply to about 69,900 acres of BLM-administered mineral estate having high potentiel for gas and oil occurrence, 59,200 acres with moderate potential, end 9,700 acres with low potential.

On 61,100 acres, the CSU constraints would protect biggame animals on overlapping winter ranges, birthing areas, and migration corridors by placing seasonal limitations on the operation and maintenance of gas and oil-producing facilities in newly-discovered fields.

During the analyets period, one or two exploratory wells would be drilled on thaae lends which include parts of the Basin-Margin Anticline and Sub-Absaroka gas and oil "plays." Plays are geologic prospects where there is a probability of commercial quantities of gas or oil being discovered. This probability is about 1 in 15 for exploratory wells in the Basin-Margin Anticline play and 1 in 22 in the Sub-Absaroka play.

If commercial quantities of gas or oil were discoverad on lands affected by these CSU constraints, maintenance end operation of the new fields could be curtailed for 6 to 8 months of the year. It is anticipated that winter and spring weather conditions would require use of these constraints during portions of about 10 to 12 years during the enalysis period.

However, it is likely that operators would continue to buy leases in areas affected by the CSU constraints. In the past, many of the problems associated with exploring these arees have been caused by adverse weather, topography, end unstable soils. These netural factors have closed the lands to access and would continue to do so, aven if administrative constraints ware not part of this alternative.

The other CSU constraints (on 77,700 acres) would be used to protect sage grouse habitat complexes (72,770 acres), sage grouse strutting erees (4,000 acres), pravent inappropriate development on landfills and shooting ranges (480 acres), and protect habitat and recreational opportunities at Wardel Reservoir (450 acres).

Controlled surface use constreinte would generally require evoidance of important habitat or recreational opportunities through the selactive placement of gas and oil facilities, or other mitigation. In habital complexes, CSU constraints would not affect exploration or development unless 20 percent of the habitat were effected by direct surface disturbance or by indirect human presence. Selective placement of exploratory wells and other structures generally would be necessary if the 20 percent level ware reached.

These constraints would not be anticipated to affect the number of wells drilled, and would have a minor influence on costs.

Timing limitations would be used to protect mule deer and pronghorn entelope on winter ranges and pronghorn fawning areas. These would affect about 225,100 acres of BLM-administered mineral estete having high potential for gas and oil occurrence, 163,900 acres with moderate potential, and 10,200 acres with low potential.

These limitations could prohibit exploratory drilling from two to six months during the year but would only be used when big game animals are present and cannot use adjacent lands. Winter and spring weather conditions would require use of these constraints during portions of about three to five years during the analysis period.

About 612,800 acres of BLM-administared mineral estate would be leasad with standard terms end conditions.

Restrictions on gas and oil leases ultimately affect the coste of exploration and development and can have an effect on the numbers of gas and oil wells drilled. Under this alternative, approximately one exploratory well would be drilled each year to test the BLM-administared mineral estate. Other information on anticipated exploration and development is contained in Table 15.

5

PAGE FROM FEDERAL LEASE AGREEMENT
*-NOTES SECTION 6 STANDARD LEASE STIPULATIONS

[illegible]

Duly executed this ______ day of ______, 19 ______ ______

(Signature of Lessee or Attorney-in-fact)

LEASE TERMS

[illegible]

6

BLM's Grass Creek Resource Area
Resource Management Plan (RMP)
Draft Environmental Impact Statement (EIS)

This draft EIS outlines four alternatives (one preferred by the BLM) for the management of the Resource Area. The Grass Creek Resource Area encompasses parts of Big Horn, Hot Springs, Park, and Washakie Counties in the North central part of Wyoming. The RMP proposes the management plan for 968,000 acres of public land surface and 1,171,000 acres of federal mineral estate in the resource area.

One should note that the public land surface is about 65% of the total surface lands (1,485,700 acres) and the mineral estate is 79% of the total in the Grass Creek Resource Area. Additionally, the revenues generated from resources (i.e., recreation, livestock grazing, forestry, and minerals) were nearly $300 million in 1990 with about 64% of the revenue coming from public lands. For the oil & gas industry, about $ 17.6 million of those public land revenues were federal royalties. Those royalties along with the severance and property taxes in Wyoming on public lands generated almost $40 million (estimated) in federal, state, and local government revenues for that year. Those dollars helped provide the services that we enjoy from government. Excessive restrictions on those public lands would not only have an impact on the local economy but also the state economy.

It appears that the BLM is proposing a major shift in the management of the public lands for the Grass Creek Resource Area. The management restrictions also appear to present a significant economic impact to the oil & gas industry. For the BLM's preferred alternative of managing the 1.2 million acres of mineral astata, the following constraints are proposed: 20,200 acres - No Surface Occupancy (NSO), 138,800 acres - Controlled Surface Use (CSU), 399,200 acres - Timing Limitations, and the remaining 612,700 acres - Standard Lease Stipulations. Please note that Standard Lease Stipulations, many times, have restrictions due to the many laws (i.e., ESA and archaology surveys) utilized with those stipulations. The hydrocarbon potential for each management area varies and is as follows: NSO (20,300 ac. total) - 2,130 ac. high potential, 15,790 - moderate, and 2,280 low; CSU (138,800 ac. total) - 69,900 high, 59,200 moderate, and 9,700 low; Timing Limitations (399,200 ac. total) - 225,100 high, 163,900 moderate, and 10,200 low; and Standard Lease Stipulations (612,700 acres) - 312,973 ac. high, 298,056 ac. moderate, and 1,771 ac. low. The CSU constraints include seasonal limitations on maintenance and operation as well as avoidance of some areas for development. Without reasonable access, that industry will not be able to continue providing their part (90%+ of the public and 60%+ of the total) of the revenues generated in the resource area.

You are encouraged to get involved during the public comment period, which ends May 7, 1995 and the public hearing (notice attached.) Written comments should be submitted to the following:

Bureau of Land Management
Bob Ross, Team Leader
P.O. Box 119
Worland, Wy 82407-0119

Should you want to individually read and evaluate the 300 page EIS, please call Mr. Ross at 307-347-9871 to get a copy of the document.

SUPPLEMENT TO PUBLIC HEARING TESTIMONY BY JIM GOULD

GRASS CREEK RESOURCE MANAGEMENT PLAN COMMENTS
COMPILED BY THE WESTETSE CONSERVATION DISTRICT
APRIL 2, 1998

WESTETSE CONSERVATION DISTRICT, HEREAFTER REFERRED TO AS WCD HAS THE RESPONSIBILITY ...TO PROVIDE FOR THE CONSERVATION OF SOIL, AND SOIL AND WATER RESOURCES OF THIS STATE...AND THEREBY STABILIZING RANCHING AND FARMING OPERATIONS, TO PRESERVE NATURAL RESOURCES, PROTECT THE TAX BASE, CONTROL FLOODS, PREVENT IMPAIRMENT OF DAMS AND RESERVOIRS, PRESERVE WILDLIFE, ENHANCE PUBLIC HEALTH, AND PROTECT AND PROMOTE THE HEALTH, SAFETY AND GENERAL WELFARE OF THE PEOPLE OF THIS STATE." BY AUTHORITY OF WYOMING STATUTE TITLE 11, CHAPTER 16, 101-120, AND UNITED STATES PUBLIC LAW 566, WCD IS A LOCAL GOVERNMENT AND THEREFORE ENJOYS ALL THE PROVISIONS AND PROTECTION OF NEPA. NEPA 42 USC 4331 SECTION 4332 (2) A (V) STATES THAT THE COMMENTS OF LOCAL GOVERNMENT AND TO BE INCLUDED IN THE GRASS CREEK AREA DRAFT RESOURCE MANAGEMENT PLAN ENVIRONMENTAL IMPACT STATEMENT, HEREAFTER REFERRED TO AS THE DRAFT, THROUGH ITS ENTIRE REVIEW PROCESS. THE BURDEN OF LAND MANAGEMENT, HEREAFTER REFERRED TO AS THE BLM, IS CURRENTLY IN VIOLATION OF NEPA AT THIS SECTION FOR THE BLM HAS NOT INCLUDED THE WRITTEN AND VERBAL COMMENTS PROVIDED BY WCD DURING THE SCOPING PROCESS. WCD IS NOT LISTED ON THE "ENGAGING REVIEWERS" ON PAGES 218 AND 219 OF THE DRAFT.

WCD IN THE INITIAL STAGES OF THIS SCOPING REQUESTED THE BLM TO CONSIDER THE PREFERRED ALTERNATIVE OF HOLISTIC RESOURCE MANAGEMENT, HEREAFTER REFERRED TO AS HRM, AND OR COORDINATED RESOURCE MANAGEMENT PLAN, HEREAFTER REFERRED TO AS CRMP.

THE RANGE UTILIZATION LEVELS ESTABLISHED BY THE FEDERAL GOVERNMENT DO NOT REFLECT CLIMATIC CHANGES AN OFTEN OVERRIDING VARIABLE ON GRAZING ALLOTMENTS. TO REFLECT CLIMATIC CHANGE CORRECTLY IN THE RANGE UTILIZATION LEVELS, HOLISTIC RESOURCE MANAGEMENT TECHNIQUES MUST BE APPLIED TO THE RESOURCE HEALTH, AND SUSTAINED GRAZING USE. CUTTING "AUM'S" BASED ON UNCERTAIN QUALITATIVE DATA AS PROPOSED IN THE DRAFT WILL NOT BENEFIT THE CUSTOM AND CULTURE AND THE ECONOMIC BASE OF THE COOPERATORS OF THE MCD.

MCD QUESTIONS WHY THE IMPORTANT BENEFITS OF LIVESTOCK GRAZING ON THE PUBLIC LAND RESOURCE ARE NOT IDENTIFIED IN THE DRAFT SUCH AS: THAT SUSTAINED LIVESTOCK GRAZING - CAN THICKEN, SUPPORT AND SUSTAIN THE MULTIPLE PLANT COMMUNITIES; THAT LIVESTOCK HOOF ACTION WORKS MINERALS INTO THE SOIL PORE SPACE, THE DIGESTION OF PLANTS (TO "LITTER"), COMBINED WITH DUNGING AND URINATION, COMPLETES THE MINERAL CYCLE; THE ELIMINATION OF REDUCTIONS (MINERALS AND OTHER NUTRIENTS BEING LOST TO THE ATMOSPHERE OR HELD IN SUSPENSION); THE INCREASE OF LITTER IMPROVES SOIL'S RESISTANCE TO WIND AND WATER EROSION, AND IMPROVES THE MOISTURE RETENTION CAPACITY OF THE SOIL. WCD DOES NOT FIND THE ABOVE MENTIONED SUBJECTS, ISSUES, OR TERMINOLOGY SUCH AS WATER CYCLE, MINERAL CYCLE, ENERGY FLOW, AND SUCCESSION WHICH ARE ENHANCED BY CATTLE GRAZING, IN THE DRAFT.

THE BLM WAS FOLLOWED THE SAME STANDARDS YEAR AFTER YEAR ONLY TO SUFFER THE SAME PITFALLS. THE EXISTING AND PROPOSED STANDARDS CANNOT BY THE SAME FOR EVERY GRAZING ALLOTMENT, THEREFORE WE NEED A NEW SET OF TOOLS FOR TRUE AND EFFECTIVE MANAGEMENT FOR THE WIDE VARIETY OF RESOURCES FOR BOTH THE PUBLIC AND PRIVATE BENEFIT. THE BLM MUST ACCEPT THE NEW DISCIPLINES AND TOOLS IN ORDER TO EFFECTIVELY AND ECONOMICALLY MANAGE, IMPROVE AND SUSTAIN THE GRASS CREEK AREA. THESE NEW TOOLS WILL TAKE INTO CONSIDERATION THE ENTIRE RESOURCE BASE, THE ECONOMIC WELL BEING, AND THE CUSTOM AND CULTURE OF THE INDIVIDUALS AND COMMUNITIES WITHIN THE GRASS CREEK AREA. MCD STRONGLY RECOMMENDS, AS EVIDENCE WE ENTERED INTO THE SCOPING PROCESS, THAT THE BLM CONSIDER THE GOALS, POLICIES, AND CONCERNS OF THE WESTETSE LAND USE AND RESOURCE MANAGEMENT PLAN - 1994, AND THAT IT BE USED IN REVIEWING AND ESTABLISHING REVISED MANAGEMENT STANDARDS IN THE FINAL DECISION FOR THE GRASS CREEK AREA.

THE DRAFT IS NOT ACCEPTABLE TO THE COOPERATORS OF THE MCD IN ITS PRESENT FORMAT. THE DRAFT MUST BE REWRITTEN TO REFLECT THE CONCERNS AND COMMENTS FOR IMPROVEMENT RECEIVED BY THE BLM OFFICIALS FROM THE PAST PUBLIC FORUMS SPONSORED BY THE LOCAL COMMUNITIES AND CORRESPONDENCE OFFERED BY AFFECTED COMMUNITIES IN THE GRASS CREEK AREA.

THE COMMENTS RECENTLY MADE BY THE BLM OFFICIALS REGARDING "RANGE AUM'S" VERSUS "ON-THE-GROUND AUM'S" IS DISTURBING, AND MCD SUGGESTS THAT THE HISTORY OF THE ADJUDICATION OF ALL EXISTING "AUM'S" ON EXISTING GRAZING ALLOTMENTS WERE WELL CONCEIVED AND NOT GOES ERRATICALLY OR WITHOUT REGARD TO THE RESOURCE. (1) WE SUGGEST THAT THE HISTORY OF THE ADJUDICATION OF GRAZING ALLOTMENTS BE RESEARCHED AND MADE PART OF THE REVISED DRAFT. FOR THE BLM TO MAINTAIN THAT A CHANGE IS NECESSARY IN THE EXISTING NUMBER OF "AUM'S" OF ANY GIVEN GRAZING ALLOTMENT WITHOUT CONCLUSIVE EVIDENCE OR A FINANCIAL RESOLUTION THEREOF, IS A TAKING OF PRIVATE PROPERTY RIGHTS, SUBJECT TO THE PROVISIONS AND JURISDICTION OF THE EXECUTIVE ORDER NUMBER 12630.

MCD WILL PROVIDE THE BLM WITH THE VIDEO "THE NEW RANGELAND COMPACT". WE BELIEVE THAT THE BLM NEEDS TO EMPLOY THE CONCEPTS AND IDEAS REPRESENTED IN THE VIDEO. YOU HAVE ASKED FOR POSITIVE INPUT, PLEASE LEAD BY EXAMPLE, EMPLOYING POSITIVE OUTPUT.

MCD REQUESTS THAT THE BLM USES ITS NEW TOOL - GEOGRAPHIC INFORMATION DATABASE AND MAPPING SYSTEMS - WHICH YOU HAVE HEAVILY INVESTED IN TO FOCUS ON REVISED RESOURCE PROBLEMS AND APPLY HOLISTIC RESOURCE MANAGEMENT TOOLS TO ALLEVIATE THOSE IDENTIFIED PROBLEMS, RATHER THAN APPLYING ONE STANDARD ACROSS THE BOARD, ON THE BASIS THAT THE PROBLEM IS AREA-WIDE RATHER THAN SITE SPECIFIC.

THE DRAFT FAILS TO TAKE ADVANTAGE OF ALL POSSIBLE LAND USE IN THE GRASS CREEK AREA. WHILE THE MCD HAVE NOT BEEN PAID UNLIKEABLE RULES AND STANDARDS ARE AGAIN BEING APPLIED IN THE DRAFT.(2,3) MCD ENCOURAGES THE BLM TO EXPLORE AND IMPLEMENT NEW, BUT TESTED, RESOURCE MANAGEMENT TECHNIQUES IN THE GRASS CREEK AREA.

THE NEED FOR BURNING IS NOT EMPHARIZED ENOUGH OR STUDIED IN THE DRAFT. THE GRASS CREEK AREA WAS ONCE PART OF A TRUE LAND MANAGEMENT CULTURE THAT USED BURNING TO ENHANCE AND SUSTAIN THE RESOURCE EVERY TEN TO FIFTY YEARS.(4) THE DRAFT DOES NOT EXPRESS THE FACT THAT OUR CULTURE HAS NOT BURNED THE RESOURCE AREA FOR THE PAST ONE HUNDRED YEARS. NOR DOES IT STATE THAT WE MUST EMPLOY THE BURNING TECHNIQUE HEAVILY OVER THE NEXT TEN YEAR PERIOD IN ORDER TO RETURN THE RESOURCE TO ITS HISTORIC LEVELS AND ELIMINATE THE TIME BOMBING CREATED BY THE PRESENT AND PROPOSED MANAGEMENT TECHNIQUE OF THE BLM --- LITTLE OR NO BURNING. WE NOT ASK THE BLM TO SPEND THE NECESSARY TIME AND EFFORT TO PROPERLY RESEARCH THE NEED FOR BURNING AND ADDRESS THAT NEED IN THE DRAFT.

THE CURRENT WAY THE BLM DEFINES ECOLOGICAL CONDITION OF THE RANGE IS AS FOLLOWS: EXCELLENT (SERAL), GOOD (LATE SERAL), FAIR (MID SERAL), AND POOR (EARLY SERAL). MCD INTERPRETS THE DRAFT AS SAYING: SUSPECT OR ALKINTHOSE WITH GOOD, FAIR, OR POOR RANGE CONDITION WILL BE PROVIDED THE REQUIRED THE NUMBER OF LIVESTOCK, TREND TO CLIMAX (LATE SERAL) OR (MID SERAL). CURRENT SCIENTIFIC LITERATURE SUGGESTS AN ALTERNATIVE WAY OF LOOKING AT RANGE CONDITION STATES THAT THE REDUCTION OR REMOVAL OF GRAZING PRESSURE WILL NOT RESULT IN A CLIMAX CONDITION. IF THE RANGE IS IN A STABLE LOWER SUCCESSIONAL STATE. (3) THE BLM MUST EMPLOY A PARADIGM SHIFT IN ORDER TO ACCEPT THE FUNDAMENTAL CHANGES IN ECOLOGICAL THEORY. THE OLD SUCCESSIONAL THEORY IS NOW BEING REFUTED AND QUESTIONED, WHILE A NEWER MODEL, THE STATE AND TRANSITION MODEL, IS REPLACING THE OLD THEORY BEHIND RANGE MANAGEMENT. MCD BELIEVES THAT THE BLM MUST MOVE FORWARD TO A NEW WAY OF THINKING CONCERNING ECOLOGICAL THEORY, AND EMPLOY THE TOOLS AND PRACTICES OF HRM TO ALLOW THE OPPORTUNITIES FOR APPLICATION OF THE STATE AND TRANSITION MODEL.(6) THE EXISTING DRAFT DOES NOT ADDRESS THE DEVELOPMENTAL MORPHOLOGY AND PHYSIOLOGY OF GRASSES AS ADDRESSED BY G.O. DRISKE, IN CHAPTER 4, "GRAZING MANAGEMENT AN ECOLOGICAL PERSPECTIVE". WE BELIEVE THAT THE BLM MUST RECOGNIZE THAT THERE IS ANOTHER WAY TO MANAGE THE GRAZING ON PUBLIC LANDS BASED ON NEW INFORMATION AND BY UTILIZING THE TOOLS AND PRACTICES OF HRM.(7)

THE ULTIMATE DRAFT MUST EMPHARIZE THE NEED FOR AND FOSTER OPPORTUNITIES FOR INCREASED MINERAL PRODUCTION AND EXPLORATION, RATHER THAN ATTEMPTING TO ELIMINATE THE POSSIBILITIES FOR EXPANSION OF THAT IMPORTANT SECTOR OF THE WYOMING AND GRASS CREEK AREA'S ECONOMY. WYOMING GOVERNOR GERINGER SUPPORTS OUR VIEW ON THE NATURAL RESOURCE EXPANSION EFFORTS, AS HE WILL PROTECT AND DEFEND OUR STATE'S BASIC INDUSTRIES AND ENSURE THE PERFORMANCE OF FEDERAL AGENCIES IN THAT REGARD. IT IS WITH THE ABOVE IN MIND THAT WE MANAGEMENT OF THE GRASS CREEK AREA THAT THE BLM REVISE THE POLICY THEY WISH TO ADOPT FOR THE ELIMINATION OF POTENTIAL AREAS FOR MINERAL DEVELOPMENT IN THE GRASS CREEK AREA. MCD SUPPORTS THE ELIMINATION OF PRESENTLY ACCESS FEDERAL LANDS FOR CONTINUED MINERAL DEVELOPMENT. THE PRODUCTION OF NATURAL GAS WILL BE ONE OF THE ELIMINATION OF POTENTIAL VIABILITY AND LIFESTYLE OF OUR COMMUNITIES FOR MANY YEARS TO COME. WE WILL NOT ACCEPT THE FEDERAL GOVERNMENT TAKE THOSE OPPORTUNITIES AWAY FROM THE COOPERATORS OF THE GRASS CREEK AREA. IN COMPLIANCE WITH THE POLICY OF THE GOVERNOR OF WYOMING, THE MCD WILL BEGIN TO INVENTORY AND ASSESS THE POTENTIAL USES WITH THE MCD INCLUDING PUBLIC ACCESS AND RECREATION, SURFACE LEASING FOR TIMBERING AND GRAZING, AND THE POTENTIAL FOR MINERAL LEASING AND DEVELOPMENT. WE ASK THAT THE BLM LISTEN AND RESPOND TO THE STATED NEW DIRECTION.

Jim E. Gould
Jim E. Gould,
Chairman

FOOTNOTES

1. Establishing Management Under the Taylor Grazing Act, F.R. Carpenter, Rangeland Society for Range Management Vol. 3, No.3, June 1981

2. Management Decisions Based on Utilization-Is It Really Management?, Lee Sharp, Kenneth Sanders, & Neil Rimbey, Rangelands, Society for Range Management Vol.16, No.1 February 1994

3. Utilization Guidelines, William E. Frost, E. Lamar Smith, and Phil R. Ogden, Rangelands, Society for Range Management, Vol. 16, No.6, December, 1994

4. Evergreen Magazine, The Evergreen Foundation, Mar.-April 1994

5. Stable States and Thresholds of Range Condition on North American Rangelands: A Viewpoint by W.A. Laycock, Journal of Range Management, Vol. 44, No. 5, Sept. 1991

6. A Fundamental Change in Ecological Theory, Newsletter Mag, Nov. 1994, Stan Parsons, Range Management Consultants, Inc.

7. Grazing Management: An Ecological Perspective, Edited by Rodney K. Heitschmidt and Jerry W. Stuth, Timber Press, 1991

Submitted by Terri M. Sporcics P.O. Box 543, Meeteetse, Wyoming 82433 1-307-868-2354

CHAPTER 2 PAGE 13 COLUMN 1 PARAGRAPH 2

QUOTE: "The chapter describes four resource management plan, alternatives, including BLM's preferred alternative".

COMMENT: All the alternatives plus the preferred alternative were all developed by BLM with no participation with inputs by communities or groups. So in actuality that leaves all the alternatives and the preferred one with a limited point of view which is the BLM's, and not be public.

CHAPTER 2 PAGE 13 COLUMN 2 PARAGRAPH 1

QUOTE: "The Preferred Alternative, was developed to balance production of commodity uses with protection of the environment".

COMMENT: The Preferred Alternative was developed with data that was extremely out of date, and not with the in-depth research that should of taken place. Also the fact that the community groups, farmers, ranchers, gas & oil, people involved in recreation, and who ever else were not involved in the beginning of the alternatives. Concerning commodity uses with protection of the environment, today's farmer and rancher have the education and knowledge of many of the development and uses, they applied it on their on land, and are applying it on public land. Lets involve them more in the process they are not all stupid or uneducated.

CHAPTER 2 PAGE 14 COLUMN 2 PARAGRAPH 3

QUOTE: "Alternative and general management options that proposed maximum development, protection, or protection of one resource at the expense of other resources were not analyzed in detailed".

COMMENT: Why Not! Something more beneficial could of come out toward developing the other alternatives. Taking the short cut can allow you to come to a faster conclusion, but it also doesn't always give you the best ways.

CHAPTER 2 PAGE 14 COLUMN 2 PARAGRAPH 3

QUOTE: "However, the alternatives analyzed in detailed do include various considerations for eliminating or maximizing individual resources or uses in specific areas where conflicts would otherwise exist".

COMMENT: You can come to this conclusion because one has looked at these considerations with the shortest way to the alternatives, and not with a total complete analyses.

SUPPLEMENT TO PUBLIC HEARING TESTIMONY BY TIM MORRISON

page 2
CHAPTER 3 PAGE 109 COLUMN 2 PARAGRAPH 5

QUOTE: "BLM has not acquired legal access on a majority of the roads currently listed on the Worland District Transportation Plan".

COMMENT: Why Not! An if not it should of been emphized in the draft.

CHAPTER 3 PAGE 111 COLUMN 2 PARAGRAPH 2 & 3

QUOTE: "Without considering the suitability the range land vegetation inventory for the planning area indicates .....allotment boundaries".
"These suitability adjustments were calculated for "1" (improve).....BLM - administered grazing allotments".

COMMENT: I believe if you read both quotes considering suitability, and how one names up with their figures does not make sense. BLM did not really take a inventory of the land that they are referring to. I question the judgment made on this issue.

CHAPTER 3 PAGE 124 & 126 COLUMN 2 & 1 PARAGRAPH 7 & 1

QUOTE: "The Revised Universal Soil Loss Equation (Renard et al 1991) was used to estimate gully and .....stream bank".
"Erosion in the planning area is not limited to the sheet and rill erosion predicted by the .....erosion would account for the remaining 75 percent".

COMMENT: When was the USGS "208 Water Quality Plan for the Big Horn Basin" done. The dates should be presented so we have a better understanding on how to apply this information towards alternatives if it is of recent date.

CHAPTER 3 PAGE 127 COLUMN 2 PARAGRAPH 1

QUOTE: "The BLM has developed approximately 63 wells from formations including the Fort Union, Mesa Verde, Lance, and Willwood. These formations yield well water ranging from 5 gallons per minute to more than 20 gallons per minute of suitable quality for livestock and wildlife. Many wells are not functioning because of deterioration over time".

COMMENT: How many wells are not functioning? An if so why has the BLM not gone back to re-hab the wells or develop others. If ranchers have access to these areas why hasn't the BLM involve both the rancher and themselves in solving the problem.

page 3
CHAPTER 3 PAGE 128 TO 131 "SURFACE WATER" THE WHOLE SECTION

COMMENT: Concerning data information is totally out of date or actually none is available (1979 to 1986). Some of the conclusions are drawn on these limited facts. I'm not disagreeing with some of the observations, what I disagree with is how the facts are drawn and how you come to your conclusions. The last paragraph addressed various watershed treatments. Why weren't these maintained, and some more are not serving their original purpose, are they causing any added problems in the area.

CHAPTER 3 PAGE 132 COLUMN 1 PARAGRAPH 1

QUOTE: "Factors Affecting Forest Land Condition" "General Factors. The forest land as a whole is not producing up to capability because of stagnation, insect and disease problems, old age and overall declining condition of stands".

COMMENT: Maybe one should re-look at this area as possibly being feasible to harvest and not have it off limits. If one is concern about forest survival, along with other environmental factors, we should not allow this area to die because of in necessibility.

CHAPTER 3 PAGE 134 COLUMN 2 PARAGRAPH 2

QUOTE: "In 1976 an estimated 50 acres were infested with noxious weeds. Since that time Russian knapweed has infested hundreds of acres along the Bighorn River and is common along Gooseberry Creek. It is anticipated that other noxious weed species and affected areas will be discovered".

COMMENT: Again data is being used that is out of date. What amount is infested with noxious weeds and what are the different kinds?

CHAPTER 3 PAGE 142 COLUMN 1 PARAGRAPH 1

QUOTE: "Big Horn Sheep: Previously used habitats in Medicine Ridge, Castle Rock, and the Holy City is being studied to evaluate the potential for Big Horn Sheep reintroduction".

COMMENT: Would that mean that this land would be taken out of future use for production of cattle and domesticated sheep. What effect will this also have in hunting and other recreational uses.

CHAPTER 3 PAGE 147 COLUMN 2 PARAGRAPH 1

QUOTE: "The planning area provides nesting habitate for around 100 species of neo-tropical migrant birds. The populations of most of these species are declining in part due to habitat fragmentation on breeding grounds in the planning area".

page 4

COMMENT: what do you mean fragmentation on breeding grounds? When statements like these are made and are not clarified or explained fingers start to point in different directions on who's fault it is.

CHAPTER 3 PAGE 147 COLUMN 2 PARAGRAPH 3

QUOTE: "Raptor electrocution may still be a problem on some of the older power lines but most have been up graded to raptor-proof standards.

COMMENT: How many power lines have not been up graded? It has already been proven that the old power lines were a major problem for raptors and that's why the up grading was being done. Why has the BLM not given the power companies a mandatory time limit on the up grade of power lines.

CHAPTER 3 PAGE 149 COLUMN 2 PARAGRAPH 4

QUOTE: "Immediately upstream of Wardell Reservoir, ... impacts on wildlife".

COMMENT The operation of this new reservoir, how much land will be taken out for public use and for animal production. What real effects will this have on the Wardel Reservoir and its fish populations plus what effects to habitat down river.

CHAPTER 3 PAGE 150 COLUMN 1 & 2 PARAGRAPH 5 & 1

QUOTE: "Wish recovery of grizzly bear population ..... increase" "Potential habitat for transient bears would ..... planning area".

COMMENTS: My concern is that the Grizzly Bear is moving into uncharted territory. What will be the BLM's moves then, will it be in total fivor of the Grizzly Bear, or on the side with the Humans?

CHAPTER 3 PAGE 150 COLUMN 2 PARAGRAPH 2

QUOTE: "Northern Rocky-Mountain Gray Wolf. During the past few years, evidence supporting the ..... A recovery plan for wolves in the Rocky Mountain ..... planning area".

COMMENT: There are two ways to look at this quote, one there are wolves in the area, and the National Parks, and United States Forest Service really screwed up. Two the BLM wrote this noting full well the wolves that are being reintroduced into the park will be leaving the area (because the wolves haven't bothered to read), and will be entering BLM's domain. So what will happen to the ranchers with livestock in the area next door, will they be compensated if damages have occurred. The big one is that they will now long be able to use the land because of the endanger species in the area.

page 5

CHAPTER 3 PAGE 151 COLUMN 1 PARAGRAPH 1 & 2

QUOTE: "Starting in the 1950's, water control..... Big Horn River continues to be a major concern" "Management actions should consider..... shed are interrelated". "The variety of land uses. ... respond in a cooperative way".

COMMENT: Why aren't these water control structures servicing there original purpose and since they are not what effects have they had on the areas that they are located? When you say "Management actions should ..... are interrelated" are you going to take in the fact that the BLM did not follow through with their obligation in taking care of the publics lands properly. When you make a statement of "require individuals, organizations, and the BLM to respond in a cooperative way" the only way I can honestly see this happen is when the BLM actually listens to the people in the communities that are in the vicinity of the public lands.

CHAPTER 4 PAGE 151 COLUMN 1&2 PARAGRAPH 1, 1-4

QUOTE: "The inventory and protection..... inventories". "Many of ....Administration". "These permits ..... available to the public". "During the past 15 years, ... management and recreational activities". "to activities of ..... analysis period".

COMMENT: When you talk about inventory and protection of cultural and paleontological resources, and how "these inventories would be funded by oil companies, utility companies ...." and then you go on to say how in the past it was 60 per cent were inventory because of gas & oil, and mineral-related activities. Then the BLM goes on to state "Comparing the anticipated level of future surface-disturbing activities to activities of the past 15 years, similar number of eligible sites would be discovered during the analysis period". There seems to be a major conflict with the statements presented by the BLM itself inside there own BLM Management Draft Plan that has been presented to the public for comment. The plan is for total cut back on these activities, so where is this funding coming from, and where are these discoveries going to occur when gas & oil and related mineral activities are really not longer have access to these areas in the plan.

BLM LIBRARY
RS 150A BLDG. 50
DENVER FEDERAL CENTER
P.O. BOX 25047
DENVER, CO 80225

☆ U.S. GOVERNMENT PRINTING OFFICE: 1996 - 776-075 / 24007 REGION NO. 8

ER'S CARD

75 1996 v.2 c.2
ental Impact
Proposed Resource
n for Grass Creek

OFFICE	DATE RETURNED

(Continued on reverse)

QH 76.5 .W8 W675 1996 v.2 c.2
Final Environmental Impact
Statement and Proposed Resource
Management Plan for Grass Creek

BLM LIBRARY
RS 150A BLDG. 50
DENVER FEDERAL CENTER
P.O. BOX 25047
DENVER, CO 80225